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FEDERAL ON-SCENE COORDINATOR'S REPORT

**METRO CONTAINER SITE
TRAINER, DELAWARE COUNTY, PENNSYLVANIA**

**CERCLA REMOVAL ACTION/RP TAKEOVER
SEPTEMBER 19, 1988 through JUNE 2, 1989**



**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III, PHILADELPHIA, PENNSYLVANIA**

AR100001

**Metro Container Site
Federal On-Scene Coordinator's Report**

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**REGION III
CERCLA REMOVAL ACTION**

**PROJECT #210
FACT SHEET**

SITE: Metro Container Site

SIZE: Four acres

LOCATION: Trainer, Delaware County, Pennsylvania

APPROVAL DATE: August 2, 1988

PROJECT DATES: September 19, 1988 through June 2, 1989

DESCRIPTION: Metro Container, a former drum reclaiming facility, operated at the site for 20 years under various names. RCRA-empty drums were bought, cleaned and resold. On December 11, 1987, a site inspection and sampling were performed by EPA and TAT personnel to determine if an immediate threat existed at the site. On February 12, 1988, the USCG, due to material migration from Metro into the Delaware River, requested the EPA Emergency Response Section to assess the potential threat of this migration. Metro Container management assured EPA that they would take responsibility for the waste materials and proceed with cleanup activities. However, no such actions were taken. Due to the inability of Metro Container management and failure of a PRP Steering Committee to conduct the cleanup, the OSC submitted an action memorandum for CERCLA funding to secure and stabilize the site. EPA removal activities included installing a perimeter fence, building and maintaining a retaining wall to prevent off-site migration of contaminants, and disposing of oil-contaminated rainwater. On June 2, 1989, the PRP Steering Committee signed a consent agreement and took over cleanup responsibility for the site.

HAZARDOUS MATERIAL: Residue of "RCRA empty" drums and contaminated rainwater.

QUANTITIES REMOVED: 136,700 gallons of contaminated rainwater.

OSC: Douglas P. Fox, Lynn C. Wilder, Alan Jackson, Charles Dispoto

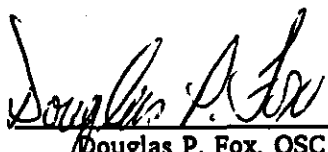
REMOVAL CONTRACTOR: Guardian Environmental Services, Inc., Bear, DE

DISPOSAL LOCATION: Waste Conversion, Hatfield, PA (contaminated rainwater only)

PROJECT CEILING: \$769,850

PROJECT COST: \$230,682 (Estimated)

COMMENTS: The PRP Steering Committee have completed their cleanup activities which included disposal of all accumulated sludge, decommissioning of the 160,000-gallon lagoon, removing on-site tanks, and grading and revegetating the site. These activities were completed in accordance with the consent agreement with EPA.



Douglas P. Fox, OSC

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**Metro Container Site
Federal On-Scene Coordinator's Report**

I. INTRODUCTION

A. Initial Situation

The Metro Container facility consisted of a three-story building that once served as a drum reclamation area. Also on site were large pieces of equipment used for washing or incinerating drums, a conveyor line, and storage tanks. A 160,000-gallon cement tank was used as a sludge storage lagoon, surrounded by a 30,000-gallon earthen berm for secondary containment. Approximately 58,000 drums, most of which were unrecyclable, were situated in the remaining area. Of these, an estimated 2,000 were filled with sludge waste. Several other small buildings on site were used as office and locker space.

On December 11, 1987, EPA CERCLA Removal Enforcement Section (CRES) Steuteville, after being notified by the Pennsylvania Department of Environmental Resources (PA DER) of a potential emergency at the Metro Container Site in Delaware County, PA, conducted a visual inspection of the drum recycling facility. After this inspection, CRES Steuteville informed OSC Douglas Fox of the situation and requested a full assessment be performed by the EPA Emergency Response Section (section name later changed to Western Removal Section).

The same day, OSC Fox and TAT performed an assessment of the facility, which was still active. Activities of the facility included reclaiming "RCRA empty," drums or those containing less than one inch of residual material, by cleaning them with acid and caustic washes or by incineration. The residual materials, mostly oily sludges, had been treated on site and transported to the Sumpter Landfill in Michigan. However, due to monetary constraints and operational problems in their sludge treatment system, the facility had begun to store the untreated sludges in a 160,000-gallon cement lagoon and in approximately 2,000 55-gallon drums. In addition, approximately 58,000 unreclaimed drums remained on the property.

Sampling during the assessment included an ash pile on site, sludge in drums, sludge in the lagoon, and liquid discharge from a drainpipe leading into nearby Stoney Creek, a tributary to the Delaware River. The site was unfenced and drums containing sludge were observed to be in extremely poor condition, many of which were leaking.

OSC Fox informed Metro Container management of EPA requirements concerning such facilities and the need for cleanup to be implemented at the site. Metro management expressed their intention to perform the necessary cleanup as required.

Results from the December 11, 1987 sampling showed a variety of contaminants in the sludge; however, none of the characteristics exhibited a threat to public health and

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**Metro Container Site
Federal On-Scene Coordinator's Report
INTRODUCTION (continued)**

not warrant a removal action. Since the facility was still active, OSC Fox referred the site to EPA RCRA Section and OSHA.

On February 2, 1988, the U.S. Coast Guard contacted OSC Fox and informed him that materials from the Metro Container facility were migrating off site and into Stoney Creek. OSC Fox and TAT again responded with a sampling assessment. Results from this assessment indicated low levels of organics were migrating into the creek. Due to the inability of the Metro Container Corporation to begin cleanup, OSC Fox submitted an action memorandum into Regional concurrence for CERCLA funds to control the off-site migration of contaminants and to erect a fence to secure the site on May 9, 1988. Regional management, because of other regional priorities and the critically low level of available CERCLA funds, delayed approval of the action memorandum and informed the OSC of this decision on June 2, 1988. At this time, negotiations continued with Metro Container Corporation management for assumption of cleanup responsibility. Enforcement Faulkin was also negotiating with several other PRPs, companies who regularly sent drums to the facility for reclaiming, via a "Steering Committee," composed of representatives of these PRPs.

On August 26, 1988, the action memorandum for the Metro Container Site was approved for \$208,800. Actions to be implemented included site stabilization, including the installation of a fence to restrict site access and provide a means to limit off-site migration of contaminants into the Delaware River via Stoney Creek. A delivery order was issued to Mini-ERCS and a TDD was cut for TAT. At this time, however, the OSC decided to await the outcome of a Steering Committee meeting scheduled for September 13, 1988, before starting the removal action. One day prior, on September 12, 1988, a planning meeting between the OSC, TAT and ERCS was held in the event that the PRP Steering Committee could not assume cleanup responsibility.

The PRP Steering Committee meeting was held as scheduled, and the committee was given until September 19, 1988 to sign a consent agreement assuming cleanup responsibility. In attendance were OSC Wilder, Enforcement Faulkin, Metro Container President Maslow, TAT member Sammons and approximately 20 legal representatives of PRPs. At this meeting, many unresolved enforcement issues were raised by the PRPs and it was apparent that negotiations would continue beyond the September 19 deadline. After the deadline passed, OSC Wilder directed Mini-ERCS and TAT to be on site September 20, 1988 to begin planned removal activities.

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**Metro Container Site
Federal On-Scene Coordinator's Report
INTRODUCTION (continued)**

B. Site Location

At the time of this writing, the Metro Container facility occupies approximately four acres at Second and Price Streets, Trainer, Delaware County, Pennsylvania. It is situated in an industrial/residential area with a British Petroleum refinery to the east and residences approximately 1500 feet to the north. Stoney Creek, which empties into the Delaware River 1000 feet from the site, also borders the facility to the east. See Appendix A for a location map and site sketch.

C. Efforts to Obtain Cleanup from Potential Responsible Party(ies)

A large number of potential responsible parties (PRPs) were involved, consisting of companies who had regularly brought drums to the Metro facility for recycling. The PRPs formed a steering committee to represent them. Difficulties resulted in the consent agreement being delayed. At this time Enforcement recommended that Superfund monies be utilized consistent with EPA's obligation to protect public health and the environment with primary consideration to negotiating a PRP cleanup response with reimbursement of the public funds expended prior to PRP takeover.

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II. ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS

A. Names and Addresses

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF DUTIES
U.S. EPA - Region III Western Removal Section 841 Chestnut Building Philadelphia, PA 19107 (215) 597-1389	Douglas P. Fox Lynn C. Wilder, OSC Charles Disposto, OSC Alan Jackson, JROSC	Federal On-Scene Coordinator; coordinated site activities to secure and stabilize the site. Assisted OSC during initial stages of the investigation.
U.S. EPA - Region III CERCLA Removal Enforcement Section 841 Chestnut Building Philadelphia, PA 19107 (215) 598-8905	William Steuteville Enforcement Officer Larry Faulkin Peter Kho	Conducted initial site investiga- tion, requested OSC assistance. Conducted negotiations with PRP Steering Committee.
U.S. EPA - Region III Office of Regional Counsel 841 Chestnut Building Philadelphia, PA 19107 (215) 597-9800	Diane Ajl	Advised OSC on legal issues.
Pennsylvania Department of Environmental Resources 1875 New Hope Street Norristown, PA 19401 (215) 270-1948	Brian Boyd	State contact responsible for inspections at the facility during background investigation.
Borough of Trainer Trainer Municipal Building 9th and Main Streets Trainer, PA 19013 (215) 497-3838	Russ Cole, Mayor George Shertenlieb, LEPC Representative Gene Corby William Nealy Harry Beck	Ensured cooperation of local agencies with EPA endeavors. Highway Chairman Borough Secretary Building Inspector

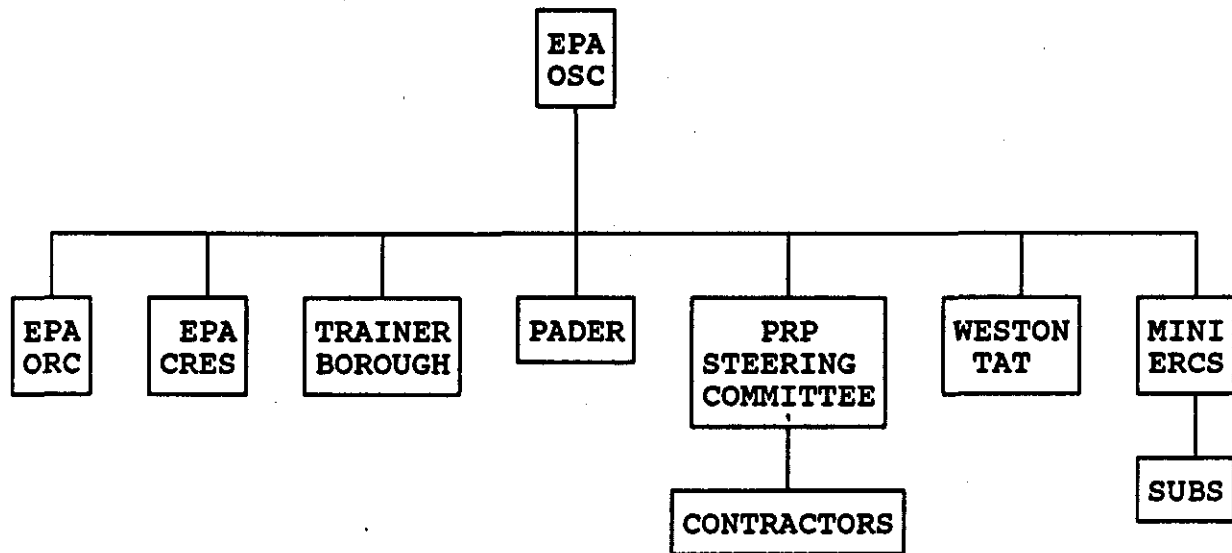
Metro Container Site
Federal On-Scene Coordinator's Report
ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS (continued)

A. Names and Addresses (continued)

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF DUTIES
Roy F. WESTON, Inc. Technical Assistance Team (TAT) 53 Haddonfield Road, Suite 306 Cherry Hill, NJ 08002 (609) 482-0222	Rita Sammons	Provided OSC with initial assessment support, technical assistance, contractor monitoring, sampling, cost tracking, photographic/site activities documentation, draft report preparation.
Guardian Environmental Services, 1280 Porter Road Bear, DE 19701 (302) 834-1000	Jack Wilson, Response Manager	Mini-ERCs prime contractor; provided manpower and equipment necessary for EPA removal.
B.P. Refinery Post Road Trainer, PA 19013 (215) 499-7000	John Ware, Safety Manager, facility adjacent to Metro	Granted permission to connect fence installed by EPA to their fence to provide complete access restriction.
Dames & Moore 2360 Maryland Road Willow Grove, PA 19090 (215) 657-5000	Thor Helgason, Project Engineer Mike Rykaczewski David Carlson	PRP steering committee consultant; estimate for PRP cleanup costs. Environmental Engineer Project Engineer
Stout Environmental Services R.R. #4, Box 140 North Woodbury Road Sewell, NJ 08080	Mark Gee, Broker/ Sales Manager	Coordinated disposal at Waste Conversion for contaminated rainwater.
Waste Conversion, Inc. 2800 Bergey Road Hatfield, PA 19440 (215) 822-2676		Ultimate disposal for oil-contaminated rainwater from EPA removal.
Central Steel Drum Company 704 Doremus Avenue Newark, NJ 07105 (201) 344-8500	Abbie Greenberg	Purchaser of equipment sold by Metro Container during EPA removal.

Metro Container Site
Federal On-Scene Coordinator's Report
ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS (continued)

B. Organization of the Response



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III. NARRATIVE OF EVENTS

Upon activation of removal funds on September 19, 1988, two concurrent activities began at the Metro Container Site. Guardian Environmental Services, the Mini-ERCS contractor, began stabilizing the site by installing a fence around the perimeter of the property and constructing a retaining wall along Stoney Creek, a tributary to the Delaware River. The fence was installed to limit public contact with on-site materials and was completed on September 29, 1988. Construction of the 300-foot retaining wall, designed by TAT after surveying the site for elevations, began on September 30, 1988 and continued until October 27, 1988. The retaining wall was to serve as a barrier to material migration into Stoney Creek in the event of a catastrophic release from the lagoon or secondary containment. Upon completion of the wall, the site was demobilized, except for periodic visits made by TAT to ensure the integrity of the retaining wall.

During and after the removal action, TAT continued to characterize the threats present at the site. A magnetometer survey was performed to locate any buried drums. Sampling of a variety of media was also conducted, including sludge, soil, and water. TAT investigated disposal options and costs for wastes that remained at the site in addition to investigations of hazards posed by the integrity of the drum reclamation building and sampling of waste materials. Results of the characterization showed low levels of organic contaminants in the sludge materials; however, characteristics did not warrant further removal action. The materials were shown to be typical oils and oil-based paints, which matched the type of customer with whom Metro Container normally dealt. As a result of these findings, a decision was made by the OSC to limit removal actions to maintaining the retaining wall. The site was defined by RCRA 40 CFR 261.33 as a hazardous waste site due to the fact that the sludge from the drums was to be discarded rather than recycled, allowing Enforcement efforts for a PRP cleanup to continue.

While the consent agreement was being developed, TAT inspected the site on a weekly basis. An erosion problem was observed along the wall in the weeks following demobilization. Attempts to correct the problem were curtailed by exceptionally large amounts of rainfall that caused the collapse of a small portion in the clay that supported the retaining wall. Also, as a result of the precipitation, the levels in both the lagoon and secondary containment reached critically high levels. During December 1988, the site was remobilized to reconstruct the wall with an underflow piping system to allow rainwater runoff to be drained. In addition, the secondary containment was emptied of oil-contaminated rainwater which was sent to Waste Conversion, Hatfield, PA. Following demobilization, an additional funding request was submitted to continue stabilization efforts at the site.

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**Metro Container Site
Federal On-Scene Coordinator's Report
NARRATIVE OF EVENTS (continued)**

The Regional Administrator approved the additional funding request on January 6, 1989. At this time, the search for disposal facilities to accept lagoon and drum sludge waste continued. TAT continued to make weekly site visits to relieve rainwater pressure at the retaining wall and to check on levels in the lagoon and secondary containment. Approximately 136,700 gallons of oil-contaminated water was disposed of during the ensuing months until spring of 1989. Guardian was required several times to make small repairs at the retaining wall; however, no large-scale removal activities were begun due to favorable progress being made in Enforcement efforts.

There were essentially two sets of PRP actions, the first of which involved Metro Container management who sold equipment from the site as part of the foreclosure agreement by the bank holding the mortgage on the property. This equipment removal, primarily from the reclamation building, was conducted under Enforcement auspices and ended in March 1989. A problem with drum dumping was suspected at this time and a security guard was reinstalled at the site under the removal action.

Meanwhile, Enforcement and the PRP Steering Committee continued to negotiate the consent agreement. Numerous consultants and contractors evaluated the site for scope of work and cleanup costs. A meeting between EPA and the Steering Committee was held on February 22, 1989. Several issues remained unresolved between the two parties at its conclusion, including cleanup of Stoney Creek and soil removal depth and cleanup standards. Stabilization efforts continued at the site. A new scope of work was proposed by the steering committee and was reviewed by EPA by May 22, 1989. On June 2, 1989, the consent agreement between EPA and the PRP (now RP) Steering Committee was signed. The proposed work plan for the \$3 million cleanup included disposal of all on-site wastes, disposal of all drums, and surface scraping of contaminated soil. The full cleanup conducted by the RP Steering Committee was completed by the first quarter of 1990.

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IV. RESOURCES COMMITTED

A. Initial Funding Request

On August 26, 1988, the Regional Administrator approved the use of \$208,000 in CERCLA funds to provide stabilization measures at the Metro Container Site. On September 16, 1988, a delivery order was issued for \$135,000 to Guardian as the Mini-ERCS prime contractor.

B. Funding Increase

Due to unexpected problems associated with heavy rainfall and delays incurred in the PRP Steering Committee's assumption of cleanup responsibility, the OSC requested a funding increase of \$561,050 in the project ceiling. This request was approved by the Regional Administrator on January 4, 1989, bringing the total project ceiling to \$769,850. Appendix B of this report contains copies of funding documentation.

C. Estimated Total Cost Summary

1. Extramural

Mini-ERCS	\$179,386
TAT	22,131
Extramural Subtotal	\$201,517

2. Intramural

EPA Direct	\$ 7,295
EPA Indirect	21,871
Intramural Subtotal	\$ 29,165

ESTIMATED TOTAL PROJECT COST	\$230,682
% Project Ceiling Expended = 30%	<hr/>

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V. EFFECTIVENESS OF THE REMOVAL

A. Activities of Various Agencies

1. Potential Responsible Party(ies)

On June 2, 1989, the PRP Steering Committee assumed full cleanup responsibility for the Metro Container facility following negotiations that began in June of 1988. In the interim, EPA provided site stabilization measures to mitigate threats posed by conditions at the site.

Extensive cleanup measures were undertaken by the RPs who signed consent agreement, including disposing of all on-site wastes, decommissioning of the on-site lagoon and tanks, disposing of 60,000 empty drums, scraping surface soil of contaminants, and grading for revegetation of the entire site. At the time of this writing, the completion date for the RP cleanup was the first quarter of 1990, subject to Enforcement approval.

2. Federal Agencies

Douglas P. Fox, EPA Region III Western Response Section (WRS), Philadelphia, Pennsylvania, served as the Federal On-Scene Coordinator (OSC) for this project. OSC Fox provided guidance for stabilization measures that were undertaken to mitigate the immediate threat posed by the site.

William Steuteville of CRES performed the initial site investigation.

Enforcement Faulkin played a major role in developing the consent agreement for the long-term RP cleanup. Interaction between WRS and Enforcement continued during the first phase of the RP cleanup with WRS supporting Enforcement in overseeing efforts via on-site monitoring and scope of work/work plan review.

3. State and Local Forces

PA DER had been investigating and inspecting the Metro Container facility for several years. They were able to provide valuable background information during EPA stabilization efforts.

Borough of Trainer officials who were involved in the project were primarily responsible for bringing the site to the attention of both PA DER and EPA through constant lobbying. In addition, during stabilization activities, local representatives were active in assisting EPA in establishing a presence at the site by aiding utility installation, providing fire response capabilities, and identifying underground lines.

AR100013

Metro Container Site
Federal On-Scene Coordinator's Report
EFFECTIVENESS OF THE REMOVAL (continued)

A. Activities of Various Agencies (continued)

4. Contractors

The Roy F. Weston, Inc., Major Programs Division, Technical Assistance Team (TAT), provided personnel from Region III to support OSC Fox. TAT provided initial response support, sampling, conducting magnetometer and structural integrity surveys, technical assistance, photographic and site activities documentation, cost tracking, contractor monitoring, and draft report preparation.

Guardian Environmental Services, Inc. of Bear, Delaware, was selected by EPA as prime cleanup contractor under the Emergency Response Cleanup Services (Mini-ERCS) mechanism. Guardian provided the manpower and equipment necessary to install the fence and the retaining wall, and arranged for the disposal of wastes at Waste Conversion.

B. Analytical Synopsis

Many media were sampled at the Metro Container Site. Analysis of sludge from drums and the lagoon revealed low levels of organics, very similar to constituents in oil; however, concentration levels did not meet RCRA characteristics criteria for hazardous waste. Sampling of on-site soils showed little contamination, primarily that of metals. Sampling of water runoff from the retaining wall showed no contamination above detection limits. Under the RP consent agreement, unbiased soil sampling was to be performed to determine the necessity of further soil cleanup.

Hard copies of analytical data from the EPA Western Removal Section sampling are not included in this report; however, these are available by contacting EPA Region III at the address/phone number in Section II, ROSTER OF AGENCIES, of this report.

C. Disposal Methods and Quantities Removed

Due to the limitations on the scope of work for the removal program, the only disposal that occurred was for site stabilization. This involved the removal of only oil-contaminated rain water from the lagoon and the secondary containment. The source of the 136,700 gallons of water was overflow from heavy rains experienced in the nine months that the WRS was conducting operations. This water was sent for oil/water separation at the Waste Conversion facility in Hatfield, PA where the oil was recycled and the water was treated and discharged. See Appendix P for manifests/bills of lading relating to WRS removal activities. The remaining wastes were removed under the RP and manifests are not included as part of this report.

AR100014

Metro Container Site
Federal On-Scene Coordinator's Report

VI. CHRONOLOGY OF EVENTS

September 13, 1988

OSC Fox and TAT met on site with ERHT representatives. After discussing the ERCS scope of work, the abovementioned toured the site (accompanied by an employee of Metro Enterprises) to allow the mini-ERCS contractor assess site conditions. The OSC was informed by ERHT that all equipment and material would be subcontracted since ERHT had limited supplies of both. The OSC explained that the intentions for mobilization would hinge upon the signing of a consent agreement by the PRPs by September 19, 1988. The OSC tasked TAT to design a berm that would be installed along the site area that bordered Stoney Creek, a tributary to the Delaware River.

The OSC and TAT accompanied Enforcement Faulkin to a PRP Steering Committee that began at 1000 hours this date. Attendees included site owner Lewis Maslow and numerous representatives of companies (including Sun Oil, B.P. Oil and DuPont) that had sent RCRA-empty drums to the site for reclamation. Since Metro intended to declare bankruptcy on September 12, 1988, several of the attendees proposed performing the site cleanup and restoring the facility to a drum reclamation operation. The PRPs requested Enforcement to address the following: 1) Whether the bank holding the lien on the facility would allow the PRPs to purchase the facility; 2) what would occur if former site owner/operators had contributed to surface and subsurface soil and water contamination issues that EPA and/or PA DER may require the PRPs to address. At the close of this meeting, it was decided that the PRP Steering Committee would meet with Enforcement and ORC on September 19, 1988 to further discuss the consent agreement.

OSC Fox was contacted by Mr. Maslow who stated that he had been referred to the OSC by Enforcement regarding a proposal to perform on-site treatment (incineration via Metro Enterprises) of approximately 15,000 drums that were on site that had no reclamation value. This operation would be performed prior to the September 23, 1988 bankruptcy hearing in order to save money and eliminate additional contamination. He assured the OSC that after the material in these drums was removed/incinerated, the drums would be cleaned and sent to a scrap metal yard. OSC Fox contacted Enforcement Faulkin regarding this conversation. Enforcement Faulkin said nothing had been discussed with Mr. Maslow that was even similar to Mr. Maslow's proposal to the OSC. Enforcement Faulkin agreed this proposal was an Enforcement issue and agreed to contact the PRP.

September 19, 1988

Due to insurance problems with EHRT, they were replaced by Guardian as the Mini-ERCS contractor. A mobile command post was placed on site to provide a workplace for the OSC and contractors during the initial phase of the removal project.

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**Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)**

OSC, TAT and Mini-ERCS personnel performed a site assessment to determine fence placement and retaining wall specifications. OSC directed TAT to design the retaining wall while the Mini-ERCS contractor began construction of the perimeter fence. The function of this retaining wall was to serve as a barrier to the flow of sludge waste to prevent migration into Stoney Creek in the event of a catastrophic loss from either the lagoon or secondary containment. OSC also tasked TAT to prepare a comprehensive sampling plan to further characterize the site.

September 20, 1988

Fencing and poles were delivered. Mini-ERCS prepared both the north and south ends of the property by clearing brush and debris for fence installation.

TAT began surveying the site for retaining wall design. TAT completed the sampling plan for further site characterization.

September 21, 1988

Mini-ERCS installed fence poles along the north end of the site. Considerable difficulty was experienced across Stoney Creek due to its extremely wet banks.

TAT investigated the terrain at the rear of the site. A thick, heavy brush was encountered. While cutting through this growth, TAT discovered numerous drums that had apparently fallen from a nearby stack. TAT was unable to safely create a path along the entire site boundary along the creek without the use of heavy equipment. TAT continued surveying to complete retaining wall design; estimated 9/24/88 completion.

September 22, 1988

Trailers owned by AMF Trucking arrived on site to unload drums. Mr. Westfall, owner of AMF, informed OSC Fox that he planned to continue using the property as a drum transfer station after the bankruptcy hearing because of the planned foreclosure on the equipment owned by Metro, but not on the property itself. OSC Fox referred the matter to Enforcement.

Mini-ERCS began stretching fencing on the north end of the site. TAT procured a laboratory for additional sampling to be conducted at designated points.

September 23, 1988

Fence construction continued and was completed up to Stoney Creek on the north end.

OSC Fox was informed that the bankruptcy hearing had been conducted and the court ruled that AMF could not conduct any further business at the Metro Container facility and must remove all possessions from the site.

AP-100016

Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

September 26, 1988

Mini-ERCS completed fence installation on the north end of the site and began installation on the east end.

AMF removed empty drums in an effort to comply with the bankruptcy court order.

TAT completed sampling to further document the extent of contamination at the site. Sampling points included drums, the lagoon, secondary containment, and a fly ash pile.

TAT completed retaining wall design and submitted to OSC Fox for review. The retaining wall was designed to run along Stoney Creek, the site drainage point.

September 27, 1988

TAT observed AMF trucks bringing drums to the site. The OSC decided to issue AMF Westfall a compliance order stating he was required to cease all drum operations on the northwest end of the property by 9/30/88, but that he could use the northeast end for drum transfer so long as OSC Fox was kept informed of what was being brought to the site and what was being removed.

Leakage from Industrial Steel (adjacent to the Metro facility) was discovered by the fence installation crew. Apparently, the leakage was sewer sludge. It was learned that the borough had no sewer lines in that area, but in fact, the leakage was from the Industrial Steel property.

A fire on the northwest corner of the site was discovered that originated in a drum and spread to the brush surrounding it. The fire company was notified, but AMF employees extinguished the fire while awaiting their arrival. This development caused a compliance order change to prohibit any burning activities on any part of the site.

Fence installation began on the south end of the property.

September 28, 1988

OSC Fox and TAT met with Metro Maslow and AMF Westfall to discuss the compliance order delivered 9/27/88. Mr. Maslow approached the OSC with the issue of removing a hydrochloric acid tank. The plan was to turn this tank over to a third party. The OSC agreed and requested that the proper manifests and documentation be prepared and then reviewed by EPA prior to transporting the tank from the site. Both Metro Maslow and AMF Westfall agreed to comply with these requirements.

Fence installation continued on the south end of the property. Cranes were leased and scheduled to remove equipment from the incinerator building on 10/3/88.

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**Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)**

September 29, 1988

Fence installation completed on the south end. The only fence activity remaining was to place barbed wire across fence tops.

Plywood was used to blockade windows in the incinerator building in order to prevent unauthorized access.

TAT observed three trucks from Noble Oil, Vincentown, NJ, on site in the designated "hot zone" (see Appendix A, Site Sketch). One of the drivers informed TAT that Noble Oil regularly pumped materials off site for Metro Container. The driver was unaware that Metro Container had become a CERCLA removal and EPA had restricted access. The trucks then departed the site.

AMF continued unloading drums in the northwest end of the site.

The first on-site drum inventory was submitted to OSC Fox for review.

September 30, 1988

Mini-ERCS completed installing barbed wire on fence tops. Mini-ERCS began cutting brush away from the site perimeter along Stoney Creek in preparation for construction of the retaining wall. Some drums had to be moved to clear a path for the wall.

OSC Fox again requested AMF to provide EPA with an inventory of drum being delivered to and removed from the site.

Metro Maslow requested permission to have equipment removed from inside the reclamation plant. He stated that some of Metro's former employees had established a company that would do the removal of the equipment, but they could not afford insurance. OSC Fox stated that no work could start until the issues of insurance, safety, and a work plan were resolved and promised to contact ORC regarding these issues.

October 3, 1988

The OSC telephoned ORC Ajl to discuss the PRP plan to remove equipment from the reclamation plant. The attorney for Central Drums, the company in charge of liquidation, and Mr. Mazlow would be contacted to discuss the equipment removal.

The OSC and TAT determined that sampling was needed within the building to identify possible contamination as well as potential hazard to workers within the building. The OSC directed TAT to conduct a structural integrity survey of the building and to develop a sampling plan to characterize contamination in the building.

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**Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)**

OSC Fox contacted Enforcement Faulkin to discuss the need for sampling and requirements for a work plan, should the building be determined safe for removing equipment.

Brush cutting along the east end of the site continued. Three of the 110 drums displaced during brush cutting operations necessitated overpacking.

October 4, 1988

Brush cutting on the east end of the site was completed. Three additional drums required overpacking.

AMF submitted an inventory of drums removed from the site and drums added to the site.

Mr. Maslow visited the command post to speak with OSC Fox regarding the time frame for his employees to begin removing equipment. OSC referred him to Enforcement Faulkin.

October 5, 1988

Drum clearing along Stoney Creek to facilitate retaining wall construction was completed.

Mr. Maslow spoke with OSC Fox concerning equipment removal from the drum reclamation building. The OSC stated that it would be several weeks before analytical results would be available from sampling that had not yet been completed.

An amendment to the safety plan to include reclamation building entry was completed.

October 6, 1988

Retaining wall construction began. The wall, made of weathered, treated plywood, was designed to be placed along Stoney Creek bordering the eastern end of the site. Due to poor soil and extensive erosion along the creek, it was necessary to install a clay foundation prior to erecting the retaining wall.

EPA and TAT performed a structural integrity survey of the reclamation building, along with an ambient air survey. No volatile organic vapors were detected above ambient background.

Sampling points were designated throughout the building to identify possible contamination sources. The points included samples of materials on the floors, of liquids in sumps and of machinery scrapings.

Metro Enterprises submitted a proposed work plan to the OSC for the removal of equipment from the reclamation building.

AR100019

Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

October 7, 1988

Retaining wall construction continued slowly due to the amount of debris encountered in the soil. Due to problems with obtaining materials, a synthetic material was substituted for clay in the bed of the wall.

OSCs Fox and Dispoto made a site entry to observe operations. Several small tanks were discovered beneath the drainage grating in the reclamation building. TAT was tasked to obtain samples for analysis.

Guardian received two bids for analytical services for reclamation building samples.

October 10, 1988

TAT obtained 6 samples from the drum reclamation building; 3 liquid, 2 soil/dust and 1 from scraping of process equipment.

Retaining wall construction continued with 56 feet of wall installed.

October 11, 1988

PA DER on site to inquire about site activities and future plans.

Retaining wall construction continued by Guardian; 80 additional feet installed.

OSC Fox arranged with Trainer Borough to conduct building and fire inspections on 10/12/88.

Results of 9/28/88 sampling were received and indicated low levels of contamination similar to the constituents of oil in sludge. Results of fly ash and soil samples showed very low levels of lead.

Tentative demobilization was planned for 10/12/88; 24-hour security arranged for this demobilization period.

OSC met with Metro Mazlow to update him on site activities. Specific items the OSC requested to be addressed in the work plan included pieces of equipment to be dismantled, how these tasks were to be accomplished, and which walls may be required to be taken down to remove equipment.

October 12, 1988

Retaining wall construction was completed. All personnel and equipment were demobilized until analytical results of the on-site and reclamation building samples were received and reviewed.

AR100020

**Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)**

Trainer Borough building and fire inspectors conducted inspections in the reclamation building. A memo was submitted to the OSC by the fire chief stating requirements to be fulfilled before Metro could begin any activity in the building.

Metro Maslow submitted an addendum to the proposed work plan for the reclamation building to OSC Fox.

24-hour site security was implemented.

October 14, 1988

Analytical results from 9/26/88 sampling were discussed in a meeting between OSCs Fox and Dispoto, Section Chief Kleeman and TAT member Sammons. The question of continued CERCLA removal activities was posed. Low level organic and metal contamination was found in the oil sludge and in soil on site. These levels did not appear to pose an imminent threat unless spillage into Stoney Creek were to occur.

October 18, 1988

A meeting was held between OSCs Fox and Dispoto, Enforcement Faulkin and TAT members Sammons and Deangelis to discuss analytical results received on 10/11/88. A decision to suspend CERCLA activities unless analytical from the 10/10/88 sampling deemed further actions were necessary.

OSC Fox referred the Metro Container site to SIS for possible NPL ranking.

November 1, 1988

Command post and 24-hour security demobilized due to suspension of removal activities.

November 3, 1988

OSC Fox sent a letter to Mayor Cole of Trainer explaining actions taken to date and the elimination of the immediate threat.

November 7, 1988

OSC Fox directed TAT and Guardian to investigate the potential problem of soil erosion by rainwater at the retaining wall. TAT suggested the problem may be due to the use of synthetic material at the wall instead of clay.

November 8, 1988

TAT and Guardian on site to correct the rainwater erosion problem at the retaining wall. One load of clay was delivered and compacted around the wall for support.

AR100021

**Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)**

November 16, 1988

TAT inspected the site for security and evaluated the stability of the retaining wall. Some puddling of rainwater occurred at the wall. TAT informed the OSC that this may be due to incomplete compaction of clay.

November 17, 1988

PA DER representatives visited the site and informed OSC Fox that additional puddling at the wall was causing soil to cave in along the wall.

TAT, as directed by the OSC, inspected the wall. After heavy rains, the wall was holding back approximately 2000 gallons of rainwater. TAT informed the OSC that although only a small trickle of water was passing under it, the wall could collapse as a result of the accumulated water.

November 21, 1988

TAT reinspected the retaining wall. Rainwater accumulation was increased due to heavy rains. The rainwater seepage had increased since the last inspection.

November 22, 1988

The OSC, TAT and Guardian met at the site to evaluate options for adding underflow pipes to the retaining wall to alleviate pressure from excess rainwater, which was allowed for in the original wall design.

November 23, 1988

ERCS relocated 22 drums that were displaced during heavy rains the previous week. Water from the retaining wall was drained into the lagoon.

November 28, 1988

TAT inspected the site and the retaining wall; the conditions required attention. The retaining wall was buckling and the rainwater that had accumulated at the wall had collapsed the clay base of the wall. The lagoon and secondary containment were close to overflowing.

November 30, 1988

TAT contacted OSC Fox with information about the site. OSC tasked TAT to investigate possibilities for disposal of lagoon and secondary containment waste (including oil, sludge and rainwater). The OSC tasked Guardian to be on site 12/1/88 to repair the retaining wall.

AR100022

**Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)**

December 1, 1988

Due to heavy rains, stabilization efforts were restarted, including repair of the collapse in the retaining wall and addressing overflow conditions of waste in the lagoon and secondary containment. Guardian began retrenching the retaining wall and building a 3-foot deep, 4-foot wide foundation of compacted clay for the wall.

OSC Fox directed Guardian to obtain a 10,000-gallon tank into which the secondary containment waste could be transferred, and to arrange disposal for these materials.

Due to limited funds remaining from the initial removal action, OSC Fox directed TAT to develop an additional funding request.

December 2, 1988

Guardian continued retrenching the area around the retaining wall.

December 3, 1988

OSC and TAT collected several lagoon samples to gauge the depth of the sludge and quantify the layering of sludge and water in it. The lagoon had a 4-foot layer of oily sludge, a 4-foot layer of water, and a 6-foot layer of sludge.

Guardian completed retrenching operations on half of the retaining wall. 9,000 gallons of secondary containment waste was transferred into the holding tank brought on site 12/1/88.

December 5, 1988

Guardian began retrenching the second half of the retaining wall.

Arrangements were completed for disposal of the waste material in the secondary containment at the Waste Conversion facility in Hatfield, PA.

December 6, 1988

The resetting of the second half of the retaining wall and compacting of clay around it were completed. Two 6-inch valved pipes were installed at the retaining wall to allow controlled discharge of rainwater from the site.

December 8, 1988

Waste Conversion pumped 10,100 gallons of secondary containment waste for disposal. Two sumps in the secondary containment were discovered during operations and were also emptied.

AR100023

Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

December 9, 1988

An additional 5,100 gallons of secondary containment waste were pumped off by Waste Conversion after the two sumps discovered on 12/8/88 were refilled with lagoon water.

OSC and TAT benchmarked levels in the lagoon and the secondary containment so that changes in either would be apparent.

OSC Fox submitted the additional funding request into regional concurrence for approval. Site was demobilized pending further stabilization actions.

December 19, 1988

TAT began investigating various disposal options for on-site sludge, which required samples of the sludge material be distributed to various vendors. The OSC directed TAT to collect the necessary samples.

December 21, 1988

TAT inspected the site for retaining wall integrity and security; both were satisfactory.

December 27, 1988

TAT inspected the site; two small holes were observed at the back of the retaining wall.

January 4, 1989

In continuing investigation of various disposal options for on-site sludge, TAT collected 3 sets of samples from the lagoon and secondary containment which were designated for disposal companies intending to bid on sludge waste disposal.

TAT checked on RCRA compliance status of the 3 facilities expected to bid on the sludge waste disposal. Delaware Container and S&W Waste were in compliance and permitted to accept Superfund site waste. Solvent Recovery Service was not in compliance.

OSC Fox received confirmation that additional funding request was approved; the new project ceiling became \$769,000.

January 5, 1989

TAT and Guardian met on site with disposal company representatives to distribute waste sludge samples and discuss disposal options.

January 23, 1989

TAT inspected retaining wall; some minor undermining had occurred at the wall due to heavy rains experienced all day. However, the wall stability was not threatened, nor was its ability to retain runoff from the site.

AR100024

**Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)**

February 3, 1989

OSC Fox was contacted by Mr. Budin of Aegis Corporation, the contractor for the PRP Steering Committee. Mr. Budin informed OSC Fox that a representative of Sun, Inc., who had been on site, had observed several blue poly drums that contained white crystalline material labeled picric acid. OSC E. Martin Powell and TAT responded to the situation to confirm the presence of these drums. OSC Powell and TAT were unable to locate the specified drums, although several blue poly drums were noted containing white crystalline material, but were not labeled.

OSC Powell contacted ORC Mary Coe. ORC Coe informed the OSC that installing a security guard was advisable in light of possible drum abandonment at the site.

February 5, 1989

A 24-hour security guard was reinstalled as a result of the incidents of 2/3/89.

February 6, 1989

OSC Fox was contacted by Enforcement Faulkin who informed that the PRP Steering Committee had submitted a work plan for site cleanup that addressed surface contamination issues.

February 10, 1989

OSC instructed TAT to drain rainwater from the retaining wall through the underflow pipes if it began to build up. TAT was also tasked to take a sample of this runoff and have it analyzed for priority pollutants.

February 14, 1989

TAT visited the site for security and to ascertain the integrity of the retaining wall. Both were satisfactory. The security guard was given the RRC 24-hour phone number to be used should an incident occur.

February 17, 1989

OSC and TAT completed reviewing the PRP Steering Committee cleanup scope of work.

February 20, 1989

Guardian repaired minor holes in the clay at the retaining wall that had been caused by erosion.

After removing the 9,000 gallons of non-hazardous liquid from the holding tank that had been pumped into it on 12/3/88, the holding tank was demobilized from the site and was sent to Waste Conversion for disposal.

AR100025

**Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)**

February 21, 1989

Due to extremely heavy rains, TAT went to the site and opened the underflow pipes to release the rainwater accumulated at the wall until the level was a quarter of an inch above the pipes.

The OSC and TAT attended a meeting with the PRP Steering Committee to review the proposed scope of work. EPA requested that rinse water from cleaning drums or tanks on site be collected and disposed of in an appropriate manner. The committee pointed out that they may have problems getting approval from the trustee in bankruptcy to disposal of drums and tanks listed as assets.

EPA requested a sampling and monitoring program for the stream with a trigger action level for cleanup. The committee felt that the stream was probably polluted from a variety of sources and did not want to be held responsible for cleaning contamination from sources other than Metro.

EPA also required that the soil removal be tied to quantified concentration levels that could be documented as protective of human health and the environment. The committee had stated that they would remove "visibly stained soil."

Stream monitoring and soil concentration level issues would be discussed internally.

February 22, 1989

TAT visited the site and obtained a rainwater sample from the retaining wall area. TAT again drained the water to a quarter of an inch above the level of the underflow pipes.

February 28, 1989

TAT inspected the retaining wall and the levels of liquid in the lagoon and secondary containment. The integrity of the retaining wall was good; however, the levels in both the lagoon and secondary containment were close to overflow. OSC Fox was informed and instructed Guardian to arrange for disposal of the liquids.

March 2, 1989

Guardian restaged drums containing waste material to provide easier access to the lagoon and its secondary containment.

An estimated 23,000 gallons of a non-hazardous waste liquid were pumped from from the secondary containment and the concrete lagoon for transport to Waste Conversion.

TAT drained rainwater from the area around the retaining wall. Guardian made some minor repair work at the wall.

AR100026

Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

March 3, 1989

An additional 20,000 gallons of non-hazardous liquid from the secondary containment was pumped into a tank truck and sent to Enroserve, a subsidiary of Waste Conversion, for disposal. TAT again drained rainwater from the retaining wall area.

March 4, 1989

An additional 26,000 gallons of non-hazardous liquid was pumped from the lagoon and secondary containment and sent to Waste Conversion for disposal.

March 6, 1989

TAT visited the site. Levels in the secondary containment and the lagoon had not changed since 3/4/89. The area around the retaining wall was relatively dry.

March 14, 1989

TAT inspected the site and drained accumulated rainwater at the retaining wall to one quarter inch above the pipes.

March 21, 1989

TAT inspected the site and drained accumulated rainwater at the retaining wall to three quarters of an inch above the pipes. Due to a light oil sheen on the water, several sorbent pads were placed on the liquid to soak up the oil.

OSC Fox conducted a site tour for Assistant Branch Chief Carney, Section Chief Kleeman, and OSC Kevin Koob.

Analytical results from the 2/22/89 water sampling were received; only low levels of phthalates were shown.

March 28, 1989

TAT arrived at the site to drain accumulated rainwater from the retaining wall area.

Five EPA HQ personnel visited the site with OSC/DPO Heston for a brief overview of the project.

April 4, 1989

TAT made weekly site inspection to drain accumulated rainwater from the retaining wall area. A slight sheen was observed on the water, and TAT fashioned a temporary boom to absorb the oil. TAT also noticed freeboard in the secondary containment was low. OSC Fox was advised of site conditions and tasked Guardian to address the oil sheen on the water.

AR100027

**Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)**

April 17, 1989

Guardian performed maintenance work on the retaining wall and removed the oil from the water at the retaining wall area.

May 2, 1989

TAT visited the site and drained 4 inches of rainwater from the retaining wall area.

May 11, 1989

TAT visited the site to drain accumulated rainwater from the retaining wall area. Due to the large amount of water that had accumulated, the underflow pipes would not open. The lagoon and secondary containment were reaching critical liquid levels.

OSC Fox was informed and tasked Guardian to install valves on the underflow pipes and to arrange for disposal of secondary containment liquids.

May 12, 1989

Guardian installed a valve on each underflow pipe and drained the water at the retaining wall. Some maintenance work at the site, including drum restacking, was also performed.

May 16, 1989

An additional 6,500 gallons of non-hazardous waste liquid was pumped from the lagoon and secondary containment.

OSC Fox was informed by Enforcement Wolper that the PRP Steering Committee was expected to make a decision on funding for site cleanup during the week of 5/22/89.

TAT drained rainwater from the retaining wall area.

May 19, 1989

TAT drained rainwater from the retaining wall area.

An additional 21,200 gallons of non-hazardous liquid was pumped from the lagoon and secondary containment and sent to Waste Conversion, Hatfield, PA.

May 23, 1989

An additional 15,800 gallons of non-hazardous liquid was pumped from the lagoon and secondary containment and sent to Waste Conversion.

May 26, 1989

TAT drained 2-3 inches of rainwater from the retaining wall area; however, an oil sheen halted the draining.

AR100028

**Metro Container Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)**

June 2, 1989

The PRP Steering Committee signed a consent agreement with EPA, thereby assuming responsibility for cleanup operations. The scope of work for the PRP contractor included disposal of all on-site drums, emptying and dismantling the lagoon and secondary containment, and disposal of contaminated surface soil.

At this time, the last Superfund monies were expended on the site and OSC Fox declared the project closed. OSC Fox agreed to periodically monitor work progress at the site.

September 6, 1989

In keeping with his agreement to monitor RP cleanup progress, OSC Fox, Enforcement Kho and TAT met with RP Response Manager Novak who updated the EPA representatives on cleanup progress. The 40,000 drums at the site had been characterized and staged awaiting disposal. Several loads of rainwater at the retaining wall had been disposed of due to a heavy oil sheen on it.

December 12, 1989

TAT and Enforcement Kho made a site inspection. All drums had been removed and sent for disposal. The lagoon and secondary containment were decommissioned, and surface soils were scraped and disposed of at a landfill. TAT and Enforcement Kho witnessed soil sampling performed by the RP contractor, representing the last phase of the RP cleanup. Results of this sampling would determine if further soil cleanup would be necessary.

AR100029

VI. PROBLEMS ENCOUNTERED AND RECOMMENDATIONS

There were several problems encountered at the Metro Container Site. The first of these was the nature of the wastes on site. Most of the wastes were a heavy oil sludge. This sludge, although it did not meet RCRA characteristics for hazardous waste, was defined in RCRA 40 CFR 261.33 as a hazardous waste because it was a waste from a drum recycler rather than a recyclable material. There was much difficulty in locating a disposal option for the oil sludge. Stabilization was not desired due to the increased volume from the addition of kiln or lime dust. Biological treatment was possible, but was estimated to take two to three years, thereby making it untimely. The final solution used was a filter press especially designed for the cleanup by the RP contractor.

Another problem was the limitation of the scope of removal actions. Initially funding was allotted strictly for stabilization and security measures. Subsequently, funding was allotted for disposal of wastes, but the negotiations with the PRP Steering Committee were advanced enough to make additional removal by EPA illogical. The most practical solution became maintenance of the site and of site security until the consent agreement was reached and signed.

One recommendation to eliminate problems such as those encountered at the Metro Container Site would be to not limit stabilization operations, but rather expand them to allow consistency with final remediation.

AR100030



WESTON · SPER

TDD Number:

PCS Number:

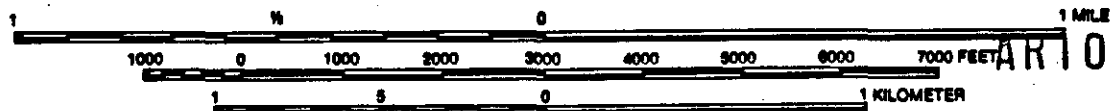


Topographic Map
Marcus Hook, PA Quadrangle

MN
GN
9°
160 MILS
0°17'
5 MILS

UTM GRID AND 1967 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

SCALE 1:24,000



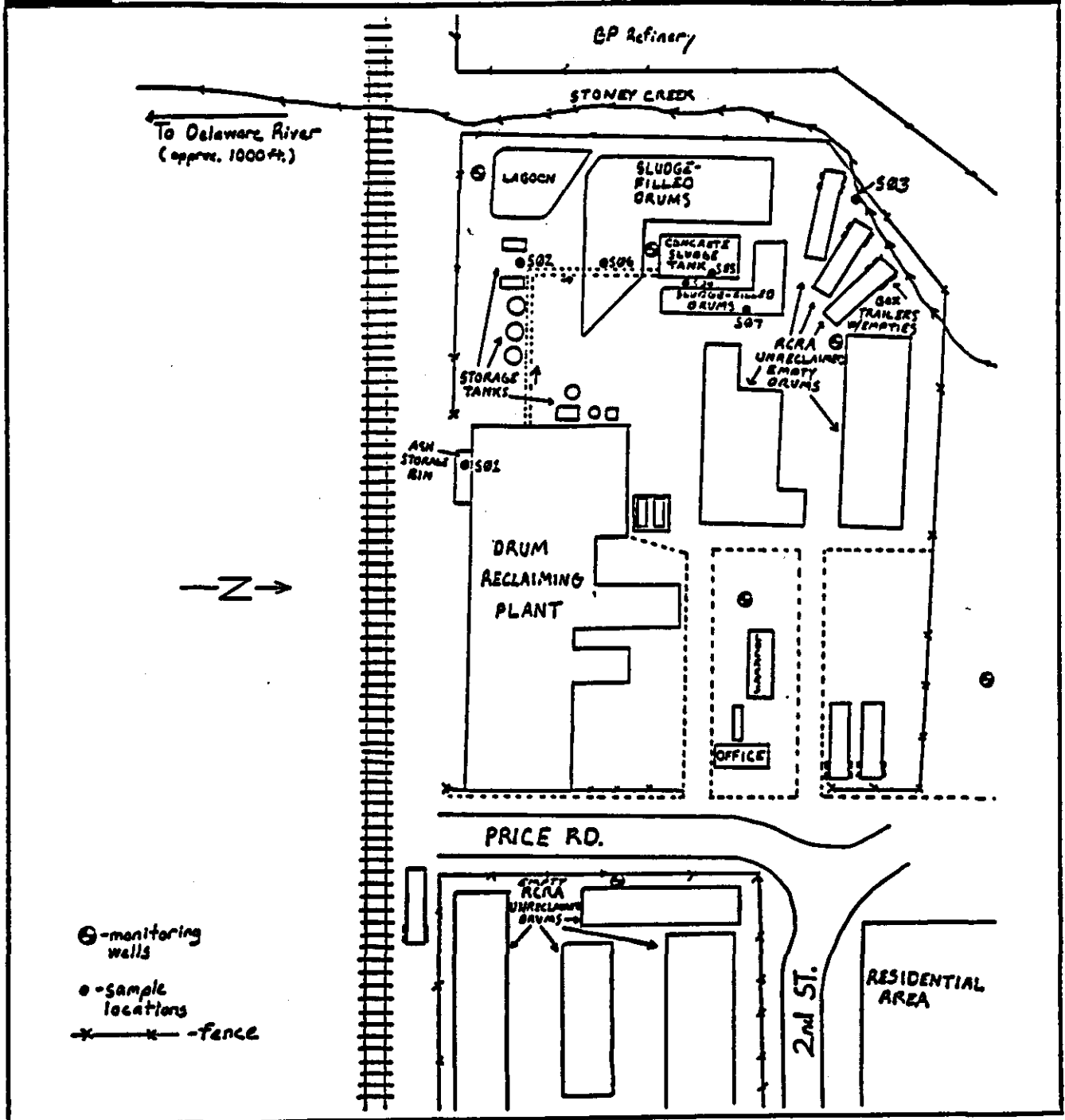
AR100031



WESTON · SPER

TDO Number:

PCS Number: 1778



Metro Container Corporation

Site Sketch

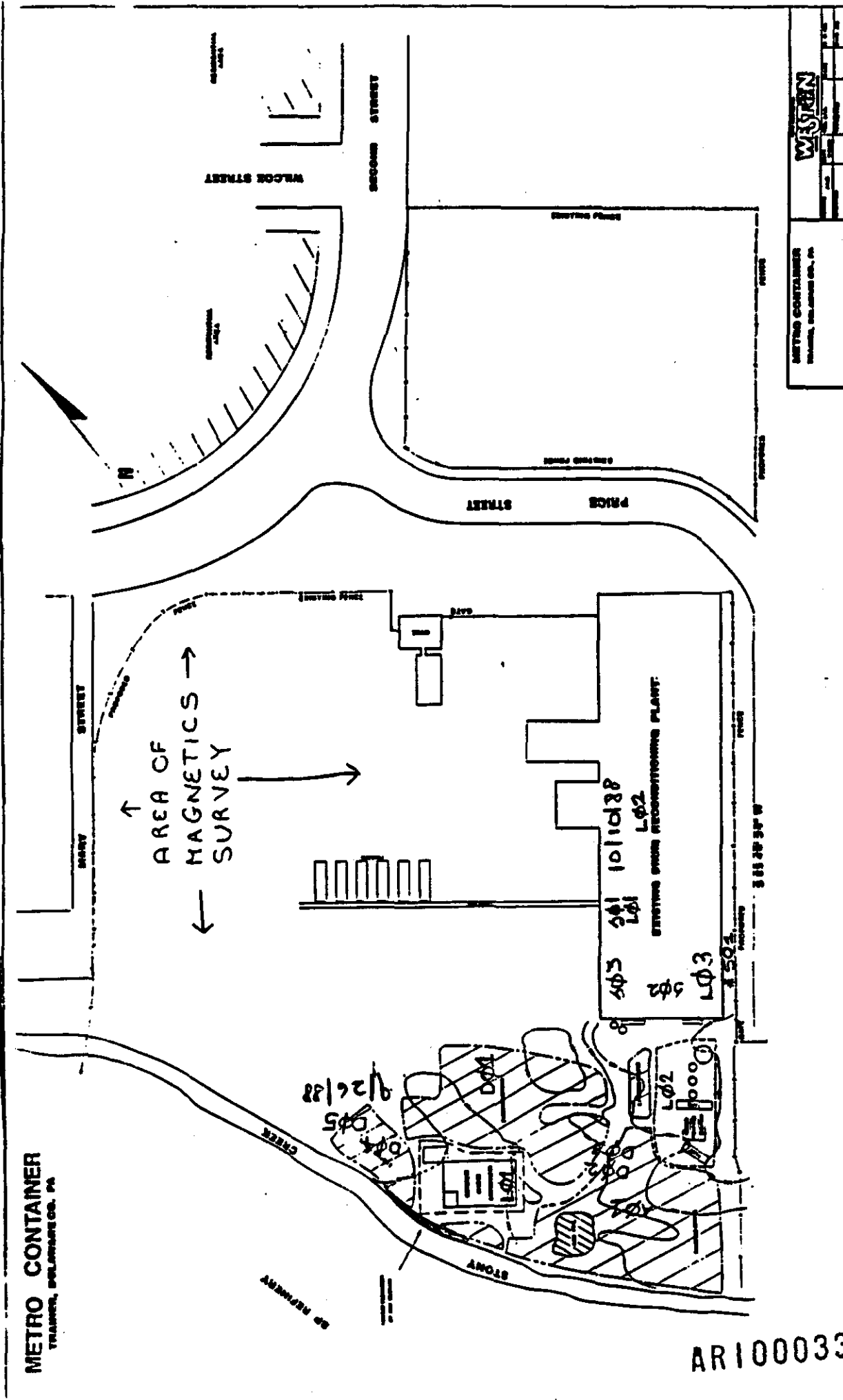
12/29/87

On Site Sampling Locations

Not to Scale

AR100032

ORIGINAL
(Red)



METRO CONTAINER
THAMER, DELAWARE CO., PA.

WESTERN

METRO CONTAINER
THAMER, DELAWARE CO., PA.

AR100033

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Justification for Approval of a CERCLA Removal
at the Metro Container Site, Trainer,
Delaware County, Pennsylvania

DATE: AUG 26 1988

FROM: James M. Seif *JMS*
Regional Administrator (3RA00)

TO: Dr. J. Winston Porter, Assistant Administrator
Solid Waste Emergency Response (WH-562-A)

ISSUE

The attached CERCLA Funding Request pertains to the Metro Container Site in Trainer, Delaware County, Pennsylvania.

Removal operations are necessary to eliminate the threat to the environment posed by the presence of improperly contained sludge and incinerated wastes from RCRA empty drums at the drum reclaiming facility. High levels of leachable lead were detected in the ash, while low levels of metals and organics were detected in the diluted sludge. The facility has a history of uncontrolled site runoff of sludge waste into Stoney Creek (a tributary to the Delaware River). The estimated total project costs are \$208,800, of which \$174,800 are extramural.

Pursuant to the Delegation of Authority 14-1-A (9/13/87), amended by Section 104 (e) of Superfund Amendments and Reauthorization Act (SARA) of 1986, which authorized the Regional Administrator to approve CERCLA Removal Actions with a total cost of less than \$2,000,000 and approve exemptions to the one-year limit, I have approved the use of CERCLA funds to control and stabilize this site.

Attachments

AR100034

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

Justification for Approval of a CERCLA Removal
at the Metro Container Site, Trainer,

SUBJECT: Delaware County, Pennsylvania

DATE: AUG 23 1988

FROM: Doug Fox, On-Scene Coordinator,
Removal Response Section (3HW22)

TO: James Seif
Regional Administrator (3RA00)

THRU: Stephen R. Wassersug, Director,
Hazardous Waste Management Division (3HWO0)

I. BACKGROUND

A. Site Description

The Metro Container site is a former drum recycling/reclaiming facility located in Trainer, Delaware County, Pennsylvania. Currently, the facility stores approximately 60,000 unreclaimed RCRA empty drums and from 500-1000 sludge filled drums. This facility has been in operation for approximately 28 years and it has undergone several changes in ownership. For five years it has been known as Metro Container. The Metro Container Corporation filed for bankruptcy (Chapter 11) on December 7, 1987.

Up until this time, the facility accepted and cleaned RCRA empty drums for resale. The resulting waste from the cleaning process underwent treatment in the onsite sludge treatment system. Through an agreement with the local sewer authority, Metro Container had been disposing of its treated sludge liquids through the local sewage system. The remaining sludge was sent for disposal to the Sumptor Landfill in Sumptor, Michigan.

The facility's sludge treatment process became inoperable in May of 1987 and resulted in the buildup of untreated sludge onsite. This material was stored onsite in an open lagoon and in unsecured drums that were sent to the facility for reclamation. Unable to handle this sludge buildup, the company decreased its reclamation process by one-half in early November 1987. All sludges generated since the decreased operations were sent for disposal to the Sumptor Landfill. The facility was financially unable to dispose of the sludge acquired before the decrease in production.

AR100035

(2)

Upon filing for bankruptcy, the facility had hoped to acquire a loan for the purchase of a new sludge filtration system and to transport the accumulation of untreated sludge to Michigan. Metro Container has ceased operations since December 12, 1987.

Wastes from the reclaiming process are also treated by onsite incineration. Metro Enterprises is the name of the facility that treats the sludge wastes by this method. Although still in operation, this facility has also declared bankruptcy. The incinerated waste ash is also sent to the Sumptor Landfill for disposal. However, a large pile of accumulated ash is currently being stored onsite.

Currently, an estimated 500-1000 unsecured 55-gallon drums onsite store the sludge waste. These drums are in poor condition and are subjected to environmental weathering. Because of their deteriorated state, many are leaking onto facility grounds. In addition an open cement lagoon contains approximately 30,000 gallons of the sludge material. Sludge waste is also present in the areas of leaking drums, between the cement lagoon and its earthen containment wall, and in earthen containment areas surrounding large onsite storage tanks. This waste is uncontained and can penetrate into the ground or migrate offsite during heavy rains.

The Metro Container facility has had two reported, uncontrolled discharges from the facility grounds into Stoney Creek (refer to the attached site sketch). The first report occurred on November 9, 1987, and originated from a facility employee. The employee reported that intermittent discharges had been occurring for approximately two years. The second report (February 12, 1988) resulted in a USCG response who traced the substance observed on the Delaware River back to the Metro Container facility.

As displayed in the attached site sketch, the facility is located on the eastern edge of the Borough of Trainer, in Delaware County, Pennsylvania. The facility property is not completely fenced. The nearest residences are located on the opposite side of Price Street, which borders the site. Approximately 500 residents are located within a quarter mile radius of the facility. Stoney Creek borders the western edge of the facility property, and an oil refinery is located on its opposite bank. Rail lines and the Delaware River and tidal flat are located south of the facility, and a metal scrap yard is located to the east. AR100036

B. Incident Characteristics

1. Incident History

On December 11, 1987, at 1330 hours, the EPA Region III Emergency Response Section was notified by EPA Enforcement of a possible emergency situation at the Metro Container Corporation. Notified by the Pennsylvania Department of Environmental Resources (PADER) of a potentially hazardous situation, EPA Enforcement had performed a visual site inspection of the facility (active at the time) on the morning of December 11, 1987. Enforcement was concerned with leaking drums containing sludge from the facility's drum cleaning process and requested that the EPA Emergency Response Section inspect the site. Although the storage of sludge material appeared to be a haphazard operation, no active offsite migration was observed and no organic vapors were detected above background in the areas of sludge storage. The Region III Technical Assistance Team (TAT) sampled at seven locations on the site, including an ash pile, sludge from two drums, the cement lagoon, and a tank containment area. A sample was also collected from the facility's former discharge point (closed under direction of PADER). The samples were analyzed for RCRA E.P. Toxicity (ash sample), full priority pollutant analysis (sludge samples), and priority pollutant metals (former discharge point).

Due to the poor housekeeping at the facility and because the facility was not RCRA-permitted for hazardous waste storage, the OSC referred the site to the Region's RCRA Enforcement Section. The OSC requested that RCRA assess the site for possible violations. The RCRA Section duplicated TAT sampling locations, and sent samples for RCRA Analysis (CRL). Results are not available at this time, but are expected in the near future. After the results are obtained, RCRA staff will review the results and comment on any violations noted during their January 1988 inspection.

On February 12, 1988, the U.S. Coast Guard (USCG) Captain of the Port of Gloucester City, NJ, responded to a spill report and traced the release to the Metro Container facility. The USCG reported that an oily substance was running over the banks of the Metro Container facility into Stoney Creek and, ultimately, into the Delaware River. The OSC was notified by the USCG and was accompanied by Enforcement, the USCG and TAT (February 18, 1988) to perform an offsite migration assessment.

AR100037

(4)

The booms in place around the February 12, 1988 runoff area (near the former discharge point) were not positioned properly to retard future runoff into Stoney Creek. Sludge waste that had leaked from the drums and standing rain water levels approached these booms.

Hay bales in place along the bank of Stoney Creek (upstream from former discharge point) were in a state of deterioration.

No active runoff over the banks into Stoney Creek was observed during the assessment; however, signs of past runoff were observed, as several points along the creek bank showed signs of past erosion.

In several locations along Stoney Creek active runoff was observed occurring that originated from points within the stream bank. Debris that had been pushed over the bank made it impossible to deduce the origin of the runoff (i.e. no piping could be observed). These areas of unknown discharge included: the following three areas close to the southern border of the facility property discharging a white material; and several areas from the former discharge point and upstream discharging a red-orange material that created slight sheens when disturbed.

An old underground pipe was noted in the stream bank near the former discharge point that was coming from the direction of the cement lagoon.

Soil and runoff water samples were collected from each of these discharge points. Analysis performed included Ph, BNA, Priority Pollutant metals, and cyanide for water samples, and EP Toxicity leachate and Priority Pollutant metals for soil samples.

2. Current Waste Management Practices

At present, all sludge remains onsite in unsecured drums, a cement lagoon, and in areas meant for emergency containment. Many of the drums are without lids and many are located in areas of standing sludge, and are rusting. In periods of rainfall, the standing sludge migrates offsite and into Stoney Creek.

The emergency containment wall around the cement lagoon is partially filled with the sludge material, indicating that the lagoon has been overfilled or that the containment area is used for sludge storage. Visual evidence exists that sludge material in the lagoon and/or the emergency containment area has been pumped over the side of the containment wall towards Stoney Creek. Other containment areas onsite that were constructed for accidental releases from tanks are also filled with the sludge material.

AR100038

A large spill of sludge material was noted from an overfilled tank (approximately 1500 gallons in volume) located on the western side of the facility treatment plant. The overfill appeared to have occurred recently, as the spilled material was still actively migrating along the ground.

The facility property is unsecured; it is not completely fenced and no security system exists.

C. Quantities and Types of Substances Present

1. Hazardous Substances Present

The enclosed site maps display locations of soil, water, and sludge samples collected by TAT on December 11, 1987 and February 19, 1988. A leachable lead concentration of 19 ppm was found in the ash pile, during the first assessment. The cement lagoon sample revealed concentrations of metals, volatile organics, base neutrals, and phenols. The two drum sludge samples revealed contaminants similar to those present in the lagoon. Samples of soil/sludge collected around the areas of leaking drums indicate similar contaminants, although lower in concentration, as found in the deteriorating drums. It should be noted that the drum samples were taken from drums that were exposed to the environment (no lids). Rainwater may have diluted the contaminants detected. Other drums that are more intact are expected to reveal higher levels of contamination.

Results from the offsite migration soil and water samples indicate the presence of metals including lead, chromium, and zinc. Water analysis revealed the presence of BNAs, cyanide and phenol.

Offsite migration will continue to pose a problem every time precipitation occurs. In addition, because of uncontrolled site access, the possibilities of vandalism, arson, and direct human contact exist. The estimated 60,000 RCRA empty drums on-site contain residuals including acids, bases, flammable liquids, poisons, and solvents. These drums are stored in the vicinity of the sludge waste, and could contribute to a fire and explosion threat.

AR100039

2. Sampling Methodology

All samples were collected by TAT with disposable sampling equipment to avoid cross contamination. Once taken, samples were preserved according to EPA sampling protocol (i.e. ice, acidification) and sent to private laboratories with appropriate labeling and chain of custodies. The laboratories were directed to perform the proper QA/QC on samples analyzed. Once the results were received, they underwent QA/QC review by TAT. All data were accepted.

D. State and Local Authorities' Roles

1. State and local actions to date

PADER (Norristown) notified the EPA Region III Enforcement Section of the situation and requested EPA assistance. Prior to this request, PADER had conducted onsite sampling, which indicated detectable levels of organics and metals in drums and soils. In addition, ground water contamination was detected in several onsite monitoring wells (local residences use municipal water for potable uses).

2. Potential for continued State response

The potential for future State involvement is not known at this time.

II. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

The Metro Container Site meets the criteria for a Removal Action under NCP Section 300.65 in that there is a threat to the environment. The NCP Removal Criteria (Section 300.65) that pertain to this site are as follows:

- Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

- High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate;

- Weather conditions that cause hazardous substances or pollutants or contaminants to migrate or be released.

AR100040

A. Threats to Public Health and Welfare.

On April 25, 1988, ATSDR indicated verbally that with the limited analytical data acquired by TAT, the site does not appear to pose an obvious threat to public health.

However, because of the unsecured nature of the site along with uncontrolled access, vandalism and/or human exposure (direct contact) and injury could easily occur. The estimated 60,000 RCRA empty drums onsite awaiting treatment may present a fire and explosion threat.

In addition, the OSC requested the Delaware County Fire Marshall to perform an inspection of the facility. After the inspection, the Fire Marshall informed the OSC that the facility was ill equipped to address a fire, in the event that one occurred within the process facility (treatment plant). The Fire Marshall did not address the possible fire and explosion threat posed by the presence of the onsite RCRA empty drums.

B. THREATS TO THE ENVIRONMENT

Threats to the environment posed by the current situation at the facility include continued offsite migration into Stoney Creek and the Delaware River and soil and ground water contamination. If response actions are not taken, offsite migration into Stoney Creek from the unknown, onsite discharge points and from the leaking drum areas will continue for an undeterminable amount of time. According to PADER analytical results, ground water monitoring wells in downgradient locations onsite indicate contamination.

III. ENFORCEMENT

The OSC has requested both CERCLA and RCRA Enforcement Sections to comment on the status of the site. RCRA is currently in the process of evaluating the site for possible violations.

See attached CERCLA Confidential Enforcement Status.

AR100041

IV. PROPOSED OPTIONS AND COSTS

Option 1 - Comprehensive Removal Response

The actions proposed to abate further offsite migration, direct contact threat to the public, and ground water contamination include the use of an onsite incineration or a solvent extraction method to treat the sludge waste in the drums, lagoon, tank, earthen containment areas, and the sludge-contaminated soils. In addition, a chain link fence will be erected. After these areas are addressed, the discharge points of unknown origin will be traced to their onsite origin and addressed.

Treatment of the wastes onsite has been selected in order to comply with the November 1988 Land Disposal Restrictions. The primary objective of the proposed action is the mitigation of the environmental threats of offsite migration and ground water contamination.

The Metro Container Site is not on the NPL, and has not received an HRS rating. This will be the first removal action at the site. The proposed actions will contribute to the efficient performance of long-term remedial actions in that it will prevent further offsite migration and ground water contamination.

This proposed action is appropriate for addressing this situation in order to comply with the November 1988 Land Disposal Restrictions. The sludge and the ash cannot be transported to a landfill in their current state. By incineration, the organics will be destroyed and the volume of waste will be reduced. Post-treatment of the ash may be necessary, as the metals present may exceed E.P Toxic levels. Since the facility is located in an industrial area and it currently employs a thermal waste treatment process, the public should not be opposed to a mobile incinerator operation. Solvent extraction may also be feasible. Because the sludge contains both organic and metal contaminants, a two-step process may be required.

Temporary solutions to abate offsite migration and to prevent further ground water contamination include the collection of waste onsite and its placement into protective containment. Because of the present volume of waste (approximately 85,000 gallons of sludge and 1500 cubic yards of soil), the containment structure(s) would be quite large. The amount of contaminated

AR100042

soil has not been estimated (this will require further sampling after drum removal). In addition, the amount of contamination from the discharge points of unknown onsite origin will not be able to be estimated until after all surface drums and soil contamination have been addressed. Therefore, the total volume of waste that would be stored onsite cannot be accurately estimated before the project begins. To implement Phase I it is estimated that \$1,800,000 would be necessary to complete the project.

Option 2 Site Stabilization: Erect fencing around the site property boundaries, berm the areas of offsite migration, and locate and retard areas onsite that are contributing to the unknown discharge points into Stoney Creek. These temporary measures could be completed in approximately sixty days from mobilization. However, these measures would not contribute to ground water contamination abatement.

Option 3 OffSite Incineration and Disposal: Transport all wastes to a permitted incineration facility for treatment and disposal. This option bears high costs associated with transportation, treatment, and disposal. If a treatment and disposal facility is not available when wastes are ready for transport, the wastes may remain at a temporary storage facility until wastes are accepted for treatment.

Option 4 Solidification: Solidify all liquid, sludge and contaminated soils. This method will result in an increased volume of waste, and may not rectify the leachability problem. This method of treatment is expected to take approximately four months to complete.

The OSC believes that option 1 is preferred because it would address all threats at the site and not likely require any future actions to mitigate the on-going off site migration of contaminants at this site. However due to the limited removal funds currently available in the Region, the OSC recommends that option 2 be implemented as first phase action.

Estimated Costs

Estimated costs have been calculated using site stabilization as the proposed action.

AR100043

(10)

Summary of Costs	Estimated Costs
(Extramural Costs)	
Cleanup Contractors	\$ 120,000.00
Cleanup Contingency (10% of Cleanup Contractor Costs)	12,000.00
TAT Costs	20,000.00
Subtotal Extramural	152,000.00
Project Contingency (15%)	22,800.00
 TOTAL EXTRAMURAL	 \$ 174,800.00
 (Intramural Costs)	
EPA Direct	
Regional (1500 hours x 30)	12,000.00
Headquarters (150 hours x 30)	1,200.00
EPA Indirect (1500 hours x 30)	20,800.00
 TOTAL INTRAMURAL	 \$ 34,000.00
 TOTAL PROJECT CEILING	 \$ 208,800.00

V. EXPECTED CHANGE IN THE SITUATION SHOULD NO ACTION BE TAKEN OR ACTION DELAYED.

Refer to Section I.B.2. of this Memorandum.

AR100044

VI. RECOMMENDATION

Because conditions at the Metro Container Site meet the NCP section 300.65 for a removal, I recommend your approval of the proposed removal action. The estimated total project costs are \$208,800.00, of which \$174,800.00 are extramural. I recommend your approval to expedite response actions due to the nature of the threat.

Approved: _____

[Signature] Regional
Administrator
(Name and Title)

Date: _____

8/26/88

Disapproval: _____

Date: _____

Attachments _____

AR100045


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

ORIGINAL
(1)

SUBJECT: Justification for Approval of a Request for a Ceiling Increase for the CERCLA Removal at the Metro Container Site, Trainer, Delaware County Pennsylvania **DATE:** JAN 04 1989

FROM: Stanley L. Laskowski 
Deputy Regional Administrator (SDA00)

TO: Dr. J. Winston Porter, Assistant Administrator
Solid Waste and Emergency Response (OS-100)

ISSUE

The attached CERCLA ceiling increase request pertains to the Metro Container Site in Trainer, Delaware County, Pennsylvania.

Continuation of stabilization actions at the site are necessary to eliminate the threat to the environment posed by the presence of improperly stored sludge in lagoons and drums at the drum-reclaiming facility. Low levels of organic and metal contamination were detected in the sludge. This sludge presents a threat to freshwater aquatic life in Stoney Creek, a tributary of the Delaware River. The facility has a history of past discharges of the sludge into this creek. A ceiling increase of \$561,050 for a total of \$769,850, \$594,000 of which is extramural cleanup contractor costs, is being requested to continue the removal action at the Metro Container Site.

Pursuant to the Delegation of Authority 14-1-A (9/13/87), and Section 104 (e) of the Superfund Amendments and Reauthorization Act (SARA) of 1986, which authorized the Regional Administrator to approve CERCLA removal actions with a total cost of less than \$2,000,000 and approve exemptions to the one-year limit, I have approved the use of CERCLA funds to control and stabilize this site.

Attachments

AR100046

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

ORIGINAL
(2)

SUBJECT: Request for a Ceiling Increase for Metro
Container Site, Trainer, Delaware County,
Pennsylvania

DATE: JAN 04 1989

FROM: *David T. Hester*
Douglas P. Fox, On-Scene Coordinator (OSC)
Western Response and Oil Enforcement Section (3HW25)

TO: Stanley L. Laskowski
Deputy Regional Administrator (3DA00)

THRU: Stephen R. Wassersug, Director *Stephen R. Wassersug*
Hazardous Waste Management Division (3HW00)

I. BACKGROUND

A. Incident/Response History

Metro Enterprises/Container is a former drum reclaiming/sludge treatment facility. The facility accepted RCRA empty drums for cleaning and reclaiming from local industry, including several refineries and large chemical companies. The sludge accumulated from the drum-cleaning process was either incinerated or sent to a sludge treatment system. The treated liquids were discharged into the local sewer system and the remaining sludge and ash from incineration were sent to a landfill. The treatment system became inoperable in May, 1987 and resulted in buildup of untreated sludge onsite. The facility continued to operate at 50% capacity but became unable financially to continue operations by December, 1987. Metro Container, the portion of the business responsible for the sludge treatment, declared bankruptcy and ceased operation in December, 1987. Metro Enterprises, the portion of the business that handled drum reclaiming and incineration, also declared bankruptcy in December, 1987 but continued to accept drums until September, 1988. The operation is currently shut down, although there is still an active drum relay station onsite, operated by AMF Drum Trucking, Inc.

In December, 1987, Region III Emergency Response Section personnel responded to a report by EPA Enforcement that an emergency situation may have existed at the Metro facility. An assessment at the site was performed and samples taken. Indications from this initial assessment were that action may be required at the site and further assessment was needed.

AR100047

On February 12, 1988, the Coast Guard responded to a spill that was traced to the Metro facility. Another assessment was performed by Removal Response at this time, including sampling for offsite migration. No levels of contaminants over EPA action levels were discovered in either assessment. Site conditions observed during the assessments were uncontrolled access to the property, accumulated sludge waste stored in an unlined and unsecured lagoon and in drums, visible soil contamination, large ash piles and areas of erosion where contamination ran into the creek behind the property. Based on these concerns, an action memorandum was submitted to the Regional Administrator and approved August 26, 1988, for a total project budget of \$208,800. The funds were designated for site security/stabilization and were used to construct a fence around the property and a containment wall to control surface sludge run-off into Stoney Creek.

The site is not currently on the National Priorities List (NPL) and is not scheduled to be proposed at this time.

B. Site Conditions

Currently, there are approximately 2500 drums onsite that are filled with sludge. A 160,000-gallon lagoon is also filled with similar sludge waste. Additional sludge waste is stored in onsite tanks and a small secondary lagoon. Additional sampling efforts during the removal action revealed contamination levels similar to those discovered during the assessment. Estimates are that 300,000 gallons of sludge waste are stored onsite. Recent analytical data have shown that this sludge waste contains concentrations of low-level organic and metal contaminants characteristic of waste petroleum and paint sludges. Although the levels are low, the sludge still requires handling and disposal as waste due to its nature. The analysis of the waste revealed levels of benzene derivatives, most specifically phthalates, as being threatening to freshwater aquatic life. These data indicate that acute or chronic exposure to the sludge waste at levels of .9 parts per million could be toxic to aquatic life in Stoney Creek and ultimately to life in the Delaware River. Levels of phthalates in the sludge range from 30 to 680 parts per million. Although the containment wall is in place at the site, the wall has been built to specifications of two-year durability, under the assumption that the sludge will be removed in that time period by one of several parties, including the Pennsylvania Department of Environmental Resources (PA DER), the Potentially Responsible Parties (PRPs) or EPA Remedial.

AR100048

The sludge waste is of the greatest concern in its potential for damage to the environment. If this waste is to be released into the nearest waterway, Stoney Creek, it would quickly migrate into the Delaware River, which is located one mile from the site. Mass migration into the river is conceivable in that most of the drums are in exceptionally poor condition and the secondary containment is being charged by overflowing sludge and rainwater. Holes in the containers are common and flow of material from the drums is visible. Stacking of empty drums among the full ones is precarious; if a stack of drums were to be upset, it is quite probable that a large number of full drums would be overturned. There have been two documented discharges from the site. From the booms laid by the previous owners, as well as noted erosion along the banks of the stream, undocumented discharges were likely in the past. Discharge from the lagoon is also very likely in that it has reached its maximum content. Its containment has accumulated sludge waste. Heavy precipitation has led to overflow of this lagoon. The lagoon is also unlined and evidence of past subsurface discharge has been found onsite.

In the event of a discharge of this sludge waste into the river, recovery operations will be chaotic due to the differing specific gravities of the sludge. The sludge, which is oil-based, is made up of many different grades of oil and other chemicals. Attempts to recover a large amount of this sludge from the river water will be intensive because both heavier and lighter than water fractions of materials will have to be recovered separately, using entirely opposite recovery methods.

Removal operations have consisted of securing the site and stabilization of the threat by fencing the property and erecting a retaining wall to prevent a catastrophic release of sludge into the creek and ultimately into the Delaware River. The retaining wall was designed to specifications to stop flow of materials like the sludge. Recent unexpected and unusual weather conditions have led to undermining of the stabilization efforts. Between November 15 and November 30, 1988, the Philadelphia area received 3.86 inches of rain that is atypical weather conditions for the area and the time of the year. The resulting water accumulation was so severe that it put beyond design-base stresses on the retaining wall. Additional reinforcing of the wall was required for continued stabilization of the site. These additional actions included retrenching of the retaining wall, backfilling the area with clay compacted every six inches and installation of a valved underflow piping system to allow runoff of rainwater but contain sludge material.

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Additional concerns as a result of recent heavy precipitation have arisen at the site. The lagoon and its secondary containment are on the verge of overflowing. Lagoon overflow in the past is evident; the secondary containment had approximately three inches of freeboard remaining. The secondary containment is an earthen berm which, over time, has degenerated considerably. Stress cracks are visible and erosion at several points is evident. The situation in the lagoon and secondary containment reached the critical level. Although the retaining wall is in place to prevent a catastrophic release into Stoney Creek, action by EPA/Western Response and Oil Enforcement at this time can prevent this release from happening. Effort now will provide a more cost-effective solution with minimal environmental impact. Cleanup after a release from the lagoon will be time-consuming, costly, inefficient, and will not prevent environmental damage. Although other parties may fund a cleanup of the sludge contained in the drums and in the lagoon, the time frame for this intervention, whether it be by PA DER, the PRPs or EPA Remedial, is at least six months away from startup. The next six months include the normally severe winter months, which will stress the secondary containment even more, and the spring which, with even minimal rainfall, will cause overflow of the lagoon and the secondary containment. The drums are in stable enough condition to survive the next six months until a full cleanup commences; the retaining wall is insurance that the drummed sludge will not migrate into the creek. But there is no question that the lagoon and the secondary containment cannot endure the next six months. These concerns have led to this request for a ceiling increase.

II. ENFORCEMENT

EPA Enforcement has been heavily involved in this site. Approximately 50 PRPs have been identified in the case. At the start of the removal action, the PRPs initially formed a steering committee to direct a possible PRP takeover of clean-up operations. However, as of September 19, 1988, due to the prohibitive cost of cleanup, the committee decided to let EPA fund cleanup and recover the cost at a later date. At the time of the original action memorandum, it was believed that a PRP cleanup would be occurring at some time; however, the PRPs unwillingness to comply assures that if EPA does not fund this cleanup, the site will remain in its present deteriorating condition. Both PA DER and Trainer officials have been aware of the problems at the site for two years but both have been powerless to eliminate its threats.

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Recent developments affecting the Metro Container Site include passage of the Pennsylvania Superfund Law and indications that the PRPs may be reconsidering their decision concerning the site. PA DER representatives have indicated that the Metro Container Site is being considered as a candidate for a Pennsylvania Superfund cleanup. A sampling team contracted by the PRPs to assess the conditions on the site have been encountered on site. However, neither of these efforts will address the threat of the overflowing lagoon and secondary containment in a timely manner.

III. PROPOSED ACTIONS

The immediate threat at the site is currently the imminent overflow of the lagoon and the secondary containment. The material contained in these is sludge discarded by a drum recycler, which is defined by RCRA, 40CFR 261.33, as hazardous waste. Analytical results have shown this to be residual sludge characteristic of petroleum and paint sludges. The levels of contaminants in the secondary containment, currently holding 25,000 gallons, are low enough to allow it to be a candidate for possible recycling. The lagoon sludge is very concentrated and extremely viscous and will require solid and liquid separation, treatment and discharge of the liquids, and treatment and landfilling of the solids. There is approximately 160,000 gallons of sludge in the lagoon. Time and cost to pump off the lagoon and the secondary containment are minimal; disposal costs for both are not. A temporary measure to alleviate the stresses of the situation has been to pump off 10,000 gallons of the secondary containment into a holding tank.

These actions will continue stabilization measures begun in September, 1988. They are to minimize damage to the environment while facilitating future reports to be undertaken during a government or private cleanup. These actions do not include drum removal nor do they address the soil contamination problem at the site. The actions proposed above are estimated to take one month and will abate the immediate threats to the environment that now exist at the site.

IV. SUMMARY OF COSTS

Summary of Costs	Current Ceiling	Proposed Ceiling
Extramural Cost		
Cleanup Contractor Cost	\$120,000	\$540,000
10% Contingency	12,000	54,000
TAT Costs	20,000	35,000
Subtotal	\$152,000	\$629,000
15% Project Contingency	22,800	94,350
Total Extramural Cost	\$174,800	\$723,350

V. RECOMMENDATION

APPROVED;

DATE:

DISAPPROVED:

DATE;

AR100052

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
SITE SAFETY PLAN

Date: 9/19/88

Project Name: METRO CONTAINER SITE

2ND & PRICE STS.

TRAINER, DELAWARE COUNTY, PA 17213

ERCS Delivery Order #: 0030-03-03

TAT Technical Direction Document #: 8809-09

U.S. EPA Site I.D.#: 8TFA3ASE2H

Adopted By:

John C. Wilber Jr.
ERCS Response Manager

Date:

9-20-88

Adopted By:

Rita Lammoro
Weston Lead TAT Member

Date:

9/19/88

Adopted By:

John C. Wilber
U.S. EPA On-Scene Coordinator

Date:

9/20/88

Adopted By:

ERCS Safety Officer

Date:

Adopted By:

Weston Safety Officer

Date:

Adopted By:

U.S. EPA Safety Officer

Date:

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MANDATORY ATTACHMENTS

- **ATTACHMENT A - SITE SAFETY PLAN AMENDMENTS**
- **ATTACHMENT B - SITE MAPS**
- **ATTACHMENT Z - SITE SAFETY PLAN ACKNOWLEDGMENT FORM**

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GLOSSARY OF ACRONYMS

ANSI	- AMERICAN NATIONAL STANDARDS INSTITUTE
APR	- AIR PURIFYING RESPIRATOR
ACGIH	- AMERICAN CONFERENCE OF GOVERNMENTAL INDUSTRIAL HYGIENISTS
CFR	- CODE OF FEDERAL REGULATIONS
CGI	- COMBUSTIBLE GAS INDICATOR
CLEAN ZONE	- SUPPORT ZONE
CSEP	- CONFINED SPACE ENTRY PERMIT
DECON	- DECONTAMINATION
ERCS	- EMERGENCY RESPONSE CLEAN-UP SERVICES
HNU-PID	- HNU PHOTOIONIZATION DETECTOR
HOT ZONE	- EXCLUSION ZONE
IDLH	- IMMEDIATELY DANGEROUS TO LIFE & HEALTH
MREM/hr	- MILLI-ROENTGENS EQUIVALENT IN MAN PER HOUR
NIOSH	- NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY & HEALTH
OSC	- ON-SCENE COORDINATOR
OSHA	- OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION LIMIT
OVA	- ORGANIC VAPOR ANALYZER
PEL	- PERMISSIBLE EXPOSURE LIMIT
PPM	- PARTS PER MILLION
RM	- RESPONSE MANAGER
SCBA	- SELF-CONTAINED BREATHING APPARATUS
SOP	- STANDARD OPERATING PROCEDURE
SPCC	- SPILL PREVENTION CONTROLS & COUNTERMEASURES
TAT	- TECHNICAL ASSISTANCE TEAM
TLV	- THRESHOLD LIMIT VALUE
TWA	- TIME WEIGHTED AVERAGE
U.S. EPA	- U.S. ENVIRONMENTAL PROTECTION AGENCY

AR100057

INTRODUCTION AND SITE ENTRY REQUIREMENTS

This document describes the health and safety guidelines developed for the Metro Container Site, to protect on-site personnel, visitors, and the public from physical harm and exposure to hazardous materials or wastes. The procedures and guidelines contained herein were based upon the best available information at the time of the plan's preparation. Specific requirements will be revised when new information is received or conditions change. A written amendment will document all changes made to the plan. Any amendments to this plan will be included in Attachment A. Where appropriate, specific OSHA standards or other guidance will be cited and applied.

DAILY SAFETY MEETINGS

Daily safety meetings will be held at the start of each shift to ensure that all personnel understand site conditions and operating procedures, to ensure that personal protective equipment is being used correctly and to address worker health and safety concerns.

SITE SAFETY PLAN ACCEPTANCE ACKNOWLEDGMENT

The OSC or designated representative shall be responsible for informing all individuals entering the exclusion zone or decontamination zone of the contents of this plan and ensuring that each person signs the Safety Plan Acknowledgment Form in Attachment Z. By signing the Safety Plan Acknowledgment Form, individuals are recognizing the hazards present on-site and the policies and procedures required to minimize exposure or adverse effects of these hazards.

TRAINING REQUIREMENTS

All personnel (including visitors) entering the exclusion zone or decontamination zone must have completed training requirements for hazardous waste site work in accordance with OSHA 29 CFR 1910.120, or be qualified by previous training or experience. Documentation of training requirements is the responsibility of each employer.

MEDICAL MONITORING REQUIREMENTS

All personnel (including visitors) entering the exclusion zone or decontamination zone must have completed appropriate medical monitoring requirements required under OSHA 29 CFR 1910.120(f). Documentation of medical monitoring is the responsibility of each employer. If there are additional medical monitoring requirements for this site, evidence of compliance must also be included.

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FIT TESTING REQUIREMENTS

All personnel (including visitors) entering the exclusion zone or decontamination zone using a full-face negative pressure respirator must have successfully passed a qualitative respirator FIT test in accordance with OSHA 29 CFR 1910.134; or, ANSI within the last 12 months. Documentation of FIT testing is the responsibility of each employer. Quantitative FIT testing is required for the use of negative pressure respirators for protection against airborne asbestos fibers (OSHA 29 CFR 1926.58) and lead (OSHA 29 CFR 1910.1025).

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2.0 SITE BACKGROUND AND SCOPE OF WORK

1.1 ROLES AND RESPONSIBILITIES

On-Scene Coordinator (OSC):

The OSC, as the representative of the U.S. EPA, is responsible for overall project administration and for coordinating health and safety standards for all individuals on-site at all times. All U.S. EPA health and safety guidelines and requirements as well as all applicable OSHA standards shall be applied. However, each contractor (as an employer under OSHA) is also responsible for the health and safety of its employees. If there is any dispute with regards to health and safety, the following procedures shall be followed:

- 1) Attempt to resolve the issue on-site; and,
- 2) If the issue cannot be resolved, on-site personnel shall consult off-site supervisors for assistance and the specific task operation in dispute shall be discontinued until the issue is resolved.

Response Manager (RM):

The Response Manager, as the field representative for the ERCS clean-up contractor, has the responsibility for fulfilling the terms of the delivery order. The RM must oversee the project and ensure that all technical, regulatory and safety requirements are met. It is the RM's responsibility to communicate with the OSC as frequently as dictated by the OSC, but at least daily, regarding site clean-up progress and any problems encountered.

Technical Assistance Team (TAT):

The Technical Assistance Team is responsible for providing the OSC with assistance and support in regards to all technical, regulatory and safety aspects of site activity. The TAT is also available to advise the OSC on matters relating to sampling, treatment, packaging, labeling, transport, and disposal of hazardous materials, but is not limited to the above-mentioned.

Other:

Any persons who observe safety problems should immediately report observations/concerns to appropriate key personnel listed on the following page.

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1.2 Key Personnel

U.S. EPA On-Scene
Coordinator (OSC):

Lynn Wilder
841 Chestnut St.
Philadelphia, Pa 19107
215-597-2711
Charles Dispoto, Alan Jackson

Alternate OSCs:

Principle ERCS Contractor:

Guardian, Inc.
1280 Porter Road
Bear, Delaware 19810
302-834-1000

Response Manager (RM):

Jack Wilson

Subcontractors:

Site Health & Safety Officer:

OSC Lynn Wilder

Alt. Health & Safety Officer:

Charles Dispoto

Technical Assistance Team (TAT):

Roy F. Weston, Inc.
53 Haddonfield Road
Cherry Hill, NJ 08002
609-482-0222

TAT Representatives:

Rita Sammons
Joe De Angelis

Other:

Bette STRANGE

Bob Gurni

AR100061

1.3 Site Background

METRO CONTAINER IS A SITE ONCE USED AS A DRUM RECLAIMING FACILITY. DRUMS WRE RECEIVED AT THE SITE, CLEANED OF SLUDGES AND RETURNED TO CUSTOMERS. THE SLUDGE WAS TREATED AND LANDFILLED. IN DECEMBER, 1987, THE FACILITY DECLARED BANKRUPTCY, DUE TO MECHANICAL FAILURE OF THE SLUDGE TREATMENT FACILITY. SLUDGE ACCUMULATED WAS PLACED IN DRUMS, TANKS AND A LAGOON ON SITE. SEVERAL DISCHARGE INCIDENTS LED TO EPA EMERGENCY RESPONSE INVESTIGATION OF THE SITE.

1.4 Scope of Work for ERCS Contractor

THE FIRST PHASE OF WORK AT THE SITE IS TO SECURE THE SITE WITH A FENCE. AS OF THIS TIME, FREE ACCESS IS AVAILABLE ANYONE WISHING TO ENTER THE SITE. ADDITIONALLY, A BERM IS TO BE PLACED ONSITE TO PREVENT RUNOFF OF THE SLUDGE INTO STONEY CREEK, WHICH RUNS INTO THE DELAWARE RIVER. THIS WILL REQUIRE CLEARING OF THE BANK ALONG THE CREEK AND LIMITED DRUM MOVEMENT BEFORE CONSTRUCTION OF THE BERM CAN BEGIN.

1.5 Scope of Work for TAT

TAT WILL PROVIDE THE OSC WITH TECHNICAL ADVICE, AS WELL AS DOCUMENTING SITE ACTIVITIES. TAT IS RESPONSIBLE TO PREPARE THIS SAFETY PLAN, POLREPS, A SITE SKETCH, AND TO ORGANIZE SITE FILES. TAT WILL ALSO PERFORM CONTRACTOR MONITORING, AIR MONITORING AND CONDUCT COST TRACKING AND DOCUMENTATION.

AR100062

2.0 TASK SAFETY AND HEALTH RISK ANALYSIS

This Hazard Assessment identifies the general hazards associated with specific site operations and presents an analysis of documented or potential chemical hazards that exist at the site. Every effort must be made to reduce or eliminate these hazards. Those which cannot be eliminated must be guarded against by use of engineering controls and/or personal protective equipment.

2.1 Activity Specific Hazards and SOPs

2.1.1 Hazards and SOPs Associated with SLUDGE ONSITE

THE SLUDGE ONSITE CONTAINS METALS AND LOW LEVELS OF VOLATILE ORGANIC CONTAMINANTS. THESE LEVELS MAY HAVE BEEN DILUTED OVER TIME WITH RAINWATER. AVOIDANCE OF SLUDGE IN DRUMS, IN THE LAGOON AND AROUND THE SITE IS RECOMMENDED IN THIS FIRST PHASE OF THE PROJECT. IF CONTACT WITH SLUDGE IS NECESSARY, A MINIMUM OF LEVEL C PROTECTION WILL BE REQUIRED.

2.1.2 Hazards and SOPs Associated with ONGOING OPERATIONS

METRO ENTERPRISES, WHICH IS CURRENTLY OPERATIONAL, OCCUPIES THE SOUTHEAST PORTION OF THE SITE. EPA, TAT AND GUARDIAN PERSONNEL ARE NOT REQUIRED TO ENTER THIS FACILITY AT THIS TIME TO ACCOMPLISH THEIR SCOPE OF WORK AND SHOULD AVOID CONTACT WITH THIS FACILITY.

AR100063

2.1.3 Hazards and SOPs Associated with SLIP, TRIP AND FALL HAZARDS:

PERSONNEL SHOULD BE AWARE THEY WILL NAVIGATING IN A VERY CONFINED AREA WHEN WORKING ALONG STONEY CREEK AND ALONG THE LAGOON. SLUDGE ACCUMULATED IN THESE AREAS MAKE CONDITIONS SLIPPERY AT BEST. CARE SHOULD BE TAKEN IN THESE AREAS TO AVOID MISHAPS.

AR100064

2.2 General Site Hazards

Lighting - Work areas must have adequate lighting for employees to see to work and identify hazards (5-foot candles minimum comparable to a single 75-100 watt bulb). Personnel should carry flashlights in all normally dark areas for use in the event of a power failure. Applicable OSHA standards for lighting - 29 CFR 1910.120 (m) - shall apply.

Electrical Power - All electrical power must have a ground fault circuit interrupter as part of the circuit. All equipment must be suitable and approved for the class of hazard. Applicable OSHA standards for electrical - 29 CFR 1926 Subpart "K" shall apply.

Walkways, etc. - Damaged and deteriorated buildings often contain unguarded walkways, doors, etc. where a fall potential exists. These must be guarded and/or posted to prevent employee use or passage. Areas where work will not be performed will be closed off and posted. Applicable OSHA standards for walkways, stairways, etc. - 29 CFR 1926.500 shall apply.

High or Elevated Work - Elevated work where a fall potential exists will be performed using appropriate ladders and/or fall protection (i.e. body harness and lifeline).

Drum Handling - The movement and opening of drums will be done in accordance with 29 CFR 1910.120 (j).

Cold Stress - When the temperature falls below 40°F, cold stress protocol shall be followed. Employees must be supplied with adequate clothing to maintain core temperature.

Heat Stress - When the temperature exceeds 70°F and personnel are wearing protective clothing, a heat stress monitoring program shall be implemented as appropriate. Employees shall have access to break periods and drinking water as necessary.

Eye Wash Protection - All operations involving the potential for eye injury, splash, etc., must have approved eye wash units locally available as per 29 CFR 1910.151 (c).

Fire Protection/Fire Prevention - Operations involving the potential for fire hazards shall be conducted in a manner as to minimize the risk. Non-sparking tools and fire extinguishers shall be used or available as appropriate. Sources of ignition shall be removed. When necessary, explosion-proof instruments and/or bonding and grounding will be used to prevent fire or explosion.

Utilities - Overhead and underground utility hazards shall be identified and or inspected prior to conducting operations involving potential contact.

AR100065

2.3 Chemical Hazards

Previous sampling and analytical data have indicated that the following chemical hazards, either documented or potential, exist at the site. Detailed hazard information for these chemicals is available at the command post.

<u>Contaminant</u>	<u>TLV/PEL</u>	<u>IDLH</u>	<u>Physical Characteristics</u>	<u>Route of Exposure</u>
CHROMIUM	1 MG/M3	500 MG/M3	COMPOUND DEPENDENT	INH ING
LEAD	.05 MG/M3	N/A	COMPOUND DEPENDENT	INH ING CONT
CYANIDE	5 MG/M3	50 MG/M3	WHITE SOLID	ING INH CONT
TETRACHLOROETHYLENE	100 PPM	CA	COLORLESS LIQUID WITH ETHER LIKE ODOR	INH ING CONT
TRICHLOROETHYLENE	100 PPM	CA	COLORLESS LIQUID WITH SWEET ODOR	INH ING CONT
TOLUENE	200 PPM	2000 PPM	COLORLESS LIQUID WITH AROMATIC ODOR	INH ING CONT ABS
DICHLOROETHANE	100 PPM	4000 PPM	COLORLESS LIQUID WITH ETHER LIKE ODOR	INH ING CONT

FIRST AID FOR THESE CHEMICALS INCLUDES: ARTIFICIAL RESPIRATION FOR INHALATION, SOAP AND WATER WASH FOR CONTACT AND IMMEDIATE MEDICAL ATTENTION FOR INGESTION.

AR100066

3.0 TRAINING AND FIT TESTING REQUIREMENTS

Refer to Introduction for Site Entry Requirements.

4.0 PERSONAL PROTECTIVE EQUIPMENT

The following is a brief description of the personal protective equipment which may be required during various phases of the project. The U.S. EPA terminology for protective equipment will be used; Levels A, B, C and D.

Respiratory protective equipment shall be NIOSH-approved and use shall conform to OSHA 29 CFR Part 1910.134 Requirements. Each employer shall maintain a written respirator program detailing selection, use, cleaning, maintenance and storage of respiratory protective equipment.

4.1 Level A Protection Shall Be Used When:

- o The extremely hazardous substance requires the highest level of protection for skin, eyes and the respiratory system;
- o Substances with a high degree of hazard to the skin are known or suspected;
- o Chemical concentrations are known to be above IDLH levels; or,
- o Biological hazards requiring Level A are known or suspected.

4.1.1 Level A Protective Equipment at a Minimum Shall Consist of:

- o Fully encapsulating exposure suit (selected for resistance to chemical(s) at the site);
- o Chemical resistant boot covers worn over safety-toe work boots;
- o Chemical resistant outer gloves (disposable);
- o Chemical resistant inner gloves (disposable);
- o Pressure demand SCBA or airline system with egress bottles;
- o Hard-hat; and,
- o Use of the "buddy system" for site entry personnel and appropriate back-up support personnel.

AR100067

4.2 Level B Protection Shall Be Used When:

- o The substance(s) has been identified and requires a high level of respiratory protection but less skin protection;
- o Concentrations of chemicals in the air are IDLH or above the maximum use limit of an APR with full-face mask;
- o Oxygen deficient or potentially oxygen deficient atmospheres (<19.5%) are possible; and/or,
- o Confined space entry requires Level B.

4.2.1 Level B Protective Equipment at a Minimum Shall Consist of:

- o Chemical resistant coveralls
- o Steel-toe workboots
- o Chemical resistant boots or disposable boot covers
- o Disposable inner gloves
- o Disposable outer gloves
- o Supplied air pressure demand SCBA or airline system with 5-minute egress bottle
- o Hard-hat and,
- o Ankles/wrists taped with duct tape.

NOTE: Use of Level B personal protective equipment requires that one (1) person must be available as backup ready to provide emergency assistance.

AR100068

4.3 Level C Protection Shall Be Used When:

- o The same level of skin protection as Level B, but a lower level of respiratory protection is required;
- o The types of air contaminants have been identified, concentrations measured, and an air-purifying respirator is available that can remove contaminants; or,
- o The substance has adequate warning properties and all criteria for the use of APR respirators has been met.

4.3.1 Level C Protective Equipment at a Minimum Shall Consist of:

- o Chemical resistant coveralls
- o Steel-toe workboots
- o Chemical resistant boots or disposable boot covers
- o Disposable inner gloves
- o Disposable outer gloves
- o Full-face air purifying respirator (APR)
- o Chemical cartridge or cannister: ORGANIC AND PARTICULATE
- o Hard-hat and,
- o Ankles/wrists taped with duct tape.

4.4 Level D Protection Shall Be Used When:

- o The atmosphere contains no known hazard; and,
- o Work functions preclude splashes, immersion or the potential for unexpected inhalation of, or contact with, hazardous concentrations of harmful chemicals.

4.4.1 Level D Protection Equipment at a Minimum Shall Consist of:

- o Standard work uniform or coveralls;
- o Safety-toe work boots;
- o Gloves as needed;
- o Safety glasses as needed;
- o Splash shield as needed; and,
- o Hard-hat.

AR100069

4.5 Activity Specific Levels of Protection

The required level of protection is specific to the activity being conducted. At this site the minimum levels of protection are as follows:

<u>Activity</u>	<u>Level of Protection</u>	<u>Special Requirements</u>
ERECTING FENCE	D	DISPOSABLE BOOTIES
BERM OPERATIONS EQUIPMENT OPERATORS	D WITH LEVEL C MASKS WITH ORGANIC/PARTICULATE CATRIDGES AVAILABLE	DISPOSABLE BOOTIES
DRUM OR SLUDGE MOVEMENT	C WITH ORGANIC/PARTICULATE CARTRIDGES	

AR100070

5.0 MEDICAL MONITORING REQUIREMENTS

Refer to Introduction for Site Entry Requirements.

6.0 AIR MONITORING AND ACTION LEVELS

According to 29 CFR 1910.120 (h) Air Monitoring shall be used to identify and quantify airborne levels of hazardous substances and health hazards in order to determine the appropriate level of employee protection needed on-site.

6.1 Routine Air Monitoring Requirements

- o Upon initial entry to rule out IDLH conditions;
- o When the possibility of an IDLH condition or flammable atmosphere has developed;
- o When work begins on a different portion of the site;
- o Contaminants other than those previously identified are being handled;
- o A different type of operation is initiated;
- o Employees are handling leaking drums or containers or working in areas with obvious liquid contamination; and,
- o During confined space work.

Air monitoring will consist at a minimum of the criteria listed below. All air monitoring data will be documented and submitted to the OSC and available in the command post site files for review by all interested persons. Air monitoring instruments will be calibrated and maintained in accordance with the manufacturer's specifications.

AR100071

6.2 Site Specific Air Monitoring Requirements

Instrument	Compounds To Detect	Frequency	Comments/ Action Level
HNU-PID	Organic vapors and gases.	4X/DAY OVER SITE WORK AREA	WORK WILL BE HALTED WHEN READINGS > 5 UNITS ABOVE BACKGROUND.

OTHER INSTRUMENTATION NOT BEING USED DUE TO EXTENSIVE MONITORING WORK DONE DURING THE ASSESSMENT PHASE OF THIS PROJECT AND DUE TO THE NATURE OF THE TASKS PLANNED. AS THE PROJECT PROGRESSES, THESE REQUIREMENTS MAY CHANGE.

AR100072

7.0 SITE CONTROL AND STANDARD OPERATING PROCEDURES

7.1 Work Zones

The primary purpose for site controls is to establish the hazardous area perimeter, to reduce migration of contaminants into clean areas and to prevent access or exposure to hazardous materials by unauthorized persons. At the end of each workday, the site should be secured or guarded, to prevent unauthorized entry. Site work zones will include:

7.1.1 Clean Zone/Support Zone

This uncontaminated support zone or clean zone will be the area outside the exclusion and decontamination zones and within the geographic perimeters of the site. This area is used for staging of materials, parking of vehicles, office and laboratory facilities, sanitation facilities, and receipt of deliveries. Personnel entering this zone may include delivery personnel, visitors, security guards, etc., who will not necessarily be permitted in the exclusion zone. All personnel arriving in the support zone will upon arrival, report to the command post and sign the site entry/exit log. There will be one controlled entry/exit point from the clean zone to the decontamination zone.

7.1.2 Decontamination Zone

The decontamination zone will provide a location for removal of contaminated personal protective equipment and final decontamination of personnel and equipment. All personnel and equipment should exit via the decon area. A separate decontamination area will be established for heavy equipment.

7.1.3 Exclusion Zone/Hot Zone

The exclusion zone will be the "hot-zone" or contaminated area inside the site perimeter. Entry to and exit from this zone will be made through a designated point and all personnel will be required to sign the hot zone entry/exit log located at the decon area. Appropriate warning signs to identify the exclusion zone should be posted (i.e. "DANGER - AUTHORIZED PERSONNEL ONLY", "PROTECTIVE EQUIPMENT REQUIRED BEYOND THIS POINT", etc.) Exit from the exclusion zone must be accompanied by personnel and equipment decontamination as described in Section 8.0.

A map of the work zones for this site follows.

AR100073

7.2 General Field Safety and Standard Operating Procedures

- o It is our policy to practice administrative hazard control for all site areas by restricting entrance to exclusion zones to essential personnel and by using operational SOPs.
- o The "buddy system" will be used at all times by all field personnel in the hotzone. No one is to perform field work alone. Maintain visual, voice or radio communication at all times.
- o Whenever possible, avoid contact with contaminated (or potentially contaminated) surfaces. Walk around (not through) puddles and discolored surfaces. Do not kneel on the ground or set equipment on the ground. Stay away from any waste drums unless necessary. Protect equipment from contamination by bagging.
- o Eating, drinking, or smoking is permitted only in designated areas in the support zone.
- o Hands and face must be thoroughly washed upon leaving the decon area.
- o Beards or other facial hair that interferes with respirator fit will preclude admission to the hot zone.
- o All equipment must be decontaminated or discarded upon exit from the exclusion zone, as determined by the OSC or designate.
- o All personnel exiting the exclusion zone must go through the decontamination procedures described in Section 8.0.
- o Safety Equipment described in Section 4.0 will be required for all field personnel.

AR100074

8.0 DECONTAMINATION PROCEDURES

In general, everything that enters the exclusion zone at this site, must either be decontaminated or properly discarded upon exit from the exclusion zone. All personnel, including any state and local officials must enter and exit the hot zone through the decon area. Prior to demobilization, contaminated equipment will be decontaminated and inspected by the OSC or OSC designate before it is moved into the clean zone. Any material that is generated by decontamination procedures will be stored in a designated area in the exclusion zone until disposal arrangements are made.

All personnel must sign the "HOT ZONE ENTRY/EXIT LOG" when entering and exiting the exclusion zone.

NOTE: The type of decontamination solution to be used is dependent on the type of chemical hazards. The decontamination solution for this site is soap and water. Decontamination solution will be changed daily (at a minimum) and collected and stored on-site until disposal arrangements are finalized.

8.1 Procedures for Equipment Decontamination

Following decontamination and prior to exit from the hot zone, the OSC or a designated alternate, shall be responsible for insuring that the item has been sufficiently decontaminated. This inspection shall be included in the site log.

8.2 Procedure for Personnel Decontamination

This decontamination procedure applies to personnel at this site wearing Level B and C protection. These are the minimum acceptable requirements:

Station 1: Equipment Drop

Deposit equipment used on-site (tools, sampling devices and monitoring instruments, radios, etc.) on plastic drop cloths. These items must be decontaminated or discarded as waste prior to removal from the exclusion zone.

Station 2: Outer Boot and Outer Glove Wash and Rinse

Scrub outer boots, outer gloves and/or splash suit with decontamination solution or detergent water. Rinse off using water.

AR100075

Station 3: Outer Boot and Glove Removal

Remove outer boots and gloves. If outer boots are disposable, deposit in container with plastic liner. If non-disposable, store in a clean dry place.

Station 4: Tank Change

If person leaves exclusion zone to change air tank, this is the last step in the decontamination procedure. Air tank is exchanged, new outer gloves and boot covers donned, joints taped, and person returns to hot zone.

Station 5: Outer Garment Removal

If applicable, remove SCBA back-pack and remain on air as long as possible. Remove Chemical Resistant Outer Garments and deposit in container lined with plastic. Decontaminate or dispose of splash suits as necessary.

Station 6: Respiratory Protection Removal

Remove hard-hat, face-piece, and if applicable, deposit SCBA on a clean surface. APR cartridges will be discarded as appropriate. Wash and rinse respirator at least daily. Wipe off and store respiratory gear in a clean, dry location.

Station 7: Inner Glove Removal

Remove inner gloves. Deposit in container for disposal.

Station 8: Field Wash

Thoroughly wash hands and face with soap and water. Shower as soon as possible.

AR100076

9.0 EMERGENCY RESPONSE CONTINGENCY PLAN

It is essential that site personnel be prepared in the event of an emergency. Emergencies can take many forms; illnesses or injuries, chemical exposure, fires, explosions, spills, leaks, releases of harmful contaminants, or sudden changes in the weather. The following sections outline the general procedures for emergencies. Emergency information should be posted as appropriate.

9.1 Emergency Contacts for METRO CONTAINER SITE

Fire: TRAINER FIRE DEPARTMENT 215-494-8711

Police: TRAINER POLICE DEPARTMENT 215-494-7399

Ambulance: AREA-WIDE AMBULANCE 215-544-6353

Hospital: CROZIER-CHESTER MEDICAL CENTER

Address: 15TH AND UPLAND AVENUE CHESTER, PA 19013

Telephone: 215-447-2000 Chemical Trauma Capabilities? Y

Poison Control Center: 215-648-1043 OR 215-568-3750

Directions from Site to Hospital (See Map in Section 9.4):

FROM 2ND AND PRICE STS., GO RIGHT ON 2ND TO EDMONT. LEFT TO 15TH ST. LEFT AGAIN TO UPLAND AVE.

NOTE: Maps and directions to the hospital will be posted in the office, decon trailers and decontamination area.

Distance from site to hospital is 3 miles. Approximate driving time is 10 MINUTES.

The following individuals have been trained in CPR and First Aid:

LYNN WILDER
RITA SAMMONS
JOE DE ANGELIS

AR100077

9.2 Additional Emergency Numbers

National Response Center	800-424-8802
Center for Disease Control	404-488-4100 (24 hr)
AT&F (Explosives Information)	800-424-9555
Chemtrec	800-424-9300
PADER	215-565-1687
EPA EMERGENCY RESPONSE	215-597-9898
TAT OFFICE	609-482-0222
Weston Medical Emergency Service	513-421-3063
Weston 24-hour Hotline	215-524-1925, 1926

AR100078

9.3 EMERGENCY EQUIPMENT AVAILABLE ON-SITE

Communications Equipment

Location

Command Post:

Mobile Telephones: 302-740-1489

Two-Way Radios:

Emergency Alarms/
Horns:

Medical Equipment

First Aid Kits: TAT VEHICLE

Stretcher/Backboard: _____

Eye Wash Station: _____

Oxygen: _____

Safety Shower: _____

Fire-Fighting Equipment

Fire Extinguishers: _____

Inspection Date: _____

By: _____

Other: _____

Spill or Leak Equipment

Absorbent Boom/Pads: _____

Dry Absorbent: _____

Additional Emergency Equipment

AR100079

9.5 Project Personnel Responsibilities During Emergencies

ON-SCENE COORDINATOR (OSC)

As the administrator of the project, the OSC has primary responsibility for responding to and correcting emergency situations. The OSC will:

- o Take appropriate measures to protect personnel including: withdrawal from the exclusion zone, total evacuation and securing of the site or up-grading or down-grading the level of protective clothing and respiratory protection.
- o Take appropriate measures to protect the public and the environment including isolating and securing the site, preventing run-off to surface waters and ending or controlling the emergency to the extent possible.
- o Ensure that appropriate Federal, State and local agencies are informed, and emergency response plans are coordinated. In the event of fire or explosion, the local fire department should be summoned immediately. In the event of an air release of toxic materials, the local authorities should be informed in order to assess the need for evacuation. In the event of a spill, sanitary districts and drinking water systems may need to be alerted.
- o Ensure that appropriate decon treatment or testing for exposed or injured personnel is obtained;
- o Determine the cause of the incident and make recommendations to prevent the recurrence; and,
- o Ensure that all required reports have been prepared.

RESPONSE MANAGER (RM)

The RM must immediately report emergency situations to the OSC, take appropriate measures to protect site personnel and assist the OSC as necessary in responding to and mitigating the emergency situation.

TECHNICAL ASSISTANCE TEAM (TAT)

The TAT must immediately report emergency situations to the OSC, take appropriate measures to protect site personnel and assist the OSC as necessary.

AR100080

9.6 Medical Emergencies:

Any person who becomes ill or injured in the exclusion zone must be decontaminated to the maximum extent possible. If the injury or illness is minor, full decontamination should be completed and first aid administered prior to transport. If the patient's condition is serious, at least partial decontamination should be completed (i.e., complete disrobing of the victim and redressing in clean coveralls or wrapping in a blanket.) First aid should be administered while awaiting an ambulance or paramedics. All injuries and illnesses must immediately be reported to the OSC.

Any person transporting an insured/exposed person to a clinic or hospital for treatment should take with them directions to the hospital and information on the chemical(s) they may have been exposed to. This information is included in Table 2.3.

Any vehicle used to transport contaminated personnel, will be cleaned or decontaminated as necessary.

9.7 Fire or Explosion:

In the event of a fire or explosion, the local fire department should be summoned immediately. Upon their arrival the OSC or designated alternate will advise the fire commander of the location, nature and identification of the hazardous materials on-site.

If it is safe to do so, site personnel may:

- o Use fire fighting equipment available on site; or,
- o Remove or isolate flammable or other hazardous materials which may contribute to the fire.

9.8 Spill or Leaks:

In the event of a spill or a leak, site personnel will:

- o Locate the source of the spillage and stop the flow if it can be done safely; and,
- o Begin containment and recovery of the spilled materials.

AR100081

9.9 Evacuation Routes and Resources:

Evacuation routes have been established by work area locations for this site. All buildings and outside work areas have been provided with two designated exit points. Evacuation should be conducted immediately, without regard for equipment under conditions of extreme emergency. See site map for evacuation routes.

- o Evacuation notification will be a continuous blast on an air horn, vehicle horn, or by verbal communication via radio.
- o Keep upwind of smoke, vapors or spill location.
- o Exit through the decontamination corridor if possible.
- o If evacuation is not via the decontamination corridor, site personnel should remove contaminated clothing once they are in a location of safety and leave it near the exclusion zone or in a safe place.
- o The OSC will conduct a head count to insure all personnel have been evacuated safely.
- o In the event that emergency site evacuation is necessary, all personnel are to:
 1. Escape the emergency situation;
 2. Decontaminate to the maximum extent practical; and,
 3. Meet at the U.S. EPA command post.
- o In the event that the U.S. EPA command post is no longer in a safe zone, meet: AT 2ND & HIGHLAND AVENUES.

AR100082

10.0 CONFINED SPACE ENTRY PROCEDURES

A confined space is defined as a space or work area not designed or intended for normal human occupancy, having limited means of access and poor natural ventilation, and or any structure, including buildings or rooms which have limited means of egress. Examples include tanks, vats, and basements. Confined spaces identified at this site are listed below.

<u>Type of Confined Space</u>	<u>Location On-Site</u>	<u>Comments</u>
-------------------------------	-------------------------	-----------------

AT THIS TIME, DUE TO THE NATURE OF THE TASKS, NO CONFINED SPACE ENTRY IS REQUIRED.

AR100083

AMENDMENTS: METRO CONTAINER SITE SAFETY PLAN

1. SCOPE of WORK for TAT: In order to characterize potential hazards onsite TAT will perform a hazardous material survey and structural integrity assessment of the drum reclamation building.

2. ACTIVITY SPECIFIC HAZARDS AND SOPs: The reclamation building has been identified as a possible site hazard. The structural stability of the building, the roof in particular, is unknown. Consequently access to the building has been prohibited until the hazard assessment has provided the site safety officer with enough evidence to indicate potential hazards do not exist. See General Site Hazards 2.2.

4.5 ACTIVITY SPECIFIC LEVELS of PROTECTION:

<u>ACTIVITY</u>	<u>LEVEL OF PROTECTION</u>	<u>SPECIAL REQUIREMENTS</u>
Drum Reclamation Building Assessment	B Until sampling has adequately indicated no hazards present.	Disposable Tyvek and Booties

6.2 SITE SPECIFIC AIR MONITORING REQUIREMENTS:

<u>INSTRUMENT</u>	<u>COMPOUNDS TO DETECT</u>	<u>FREQUENCY</u>	<u>COMMENTS/ ACTION LEVEL</u>
HNU-PID	organic vapors gases	continuous while in building	Work will be halted when readings >5 units above background
EXPLOSIMETER/ L.E.L.	Oxygen deficient atmospheres and explosive environments	Inside the confines of the building	>20% and <18% O2 2.4% LEL
DRAFTER TUBES	Hydrogen Sulfide	Before entering any closed area	Color change indicating > 5 ppm

8.0 DECONTAMINATION PROCEDURES: Same as "General Field Safety and Standard Operating Procedures" in the site safety plan.

AR100084

SITE SAFETY PLAN AMENDMENT # _____:

SITE NAME: _____

DATE: _____

TYPE OF AMENDMENT: _____

REASON FOR AMENDMENT: _____

ALTERNATE SAFEGUARD PROCEDURES: _____

REQUIRED CHANGES IN PPE: _____

ERCS Response Manager (Date) ERCS Safety Officer (Date)

Weston Lead TAT Member (Date) Weston RSO (Date)

U.S. EPA OSC (Date) U.S. EPA Safety Officer (Date)

AR100085

To Delaware River
(approx. 1000 ft.)



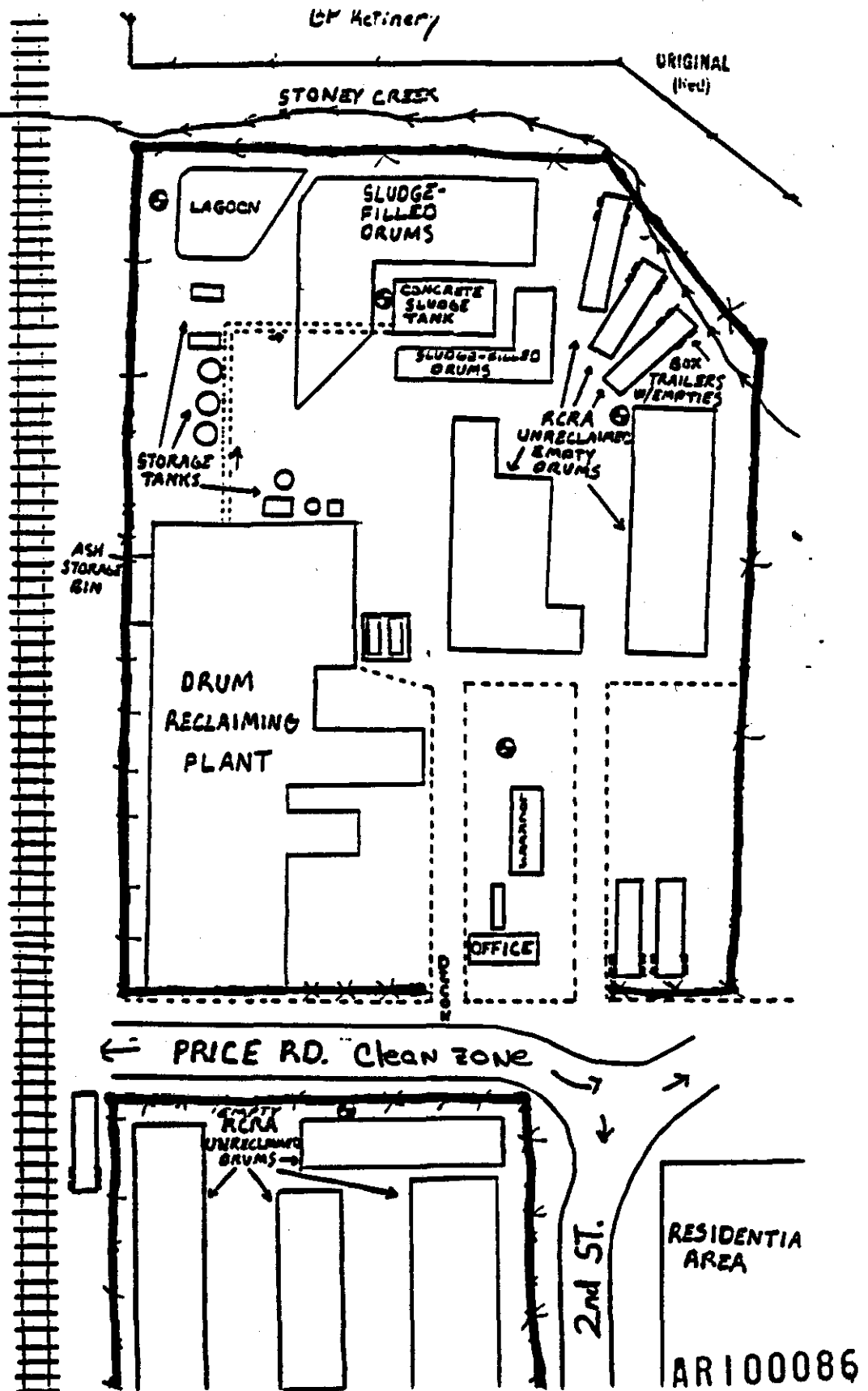
1 in. \approx 100 ft.

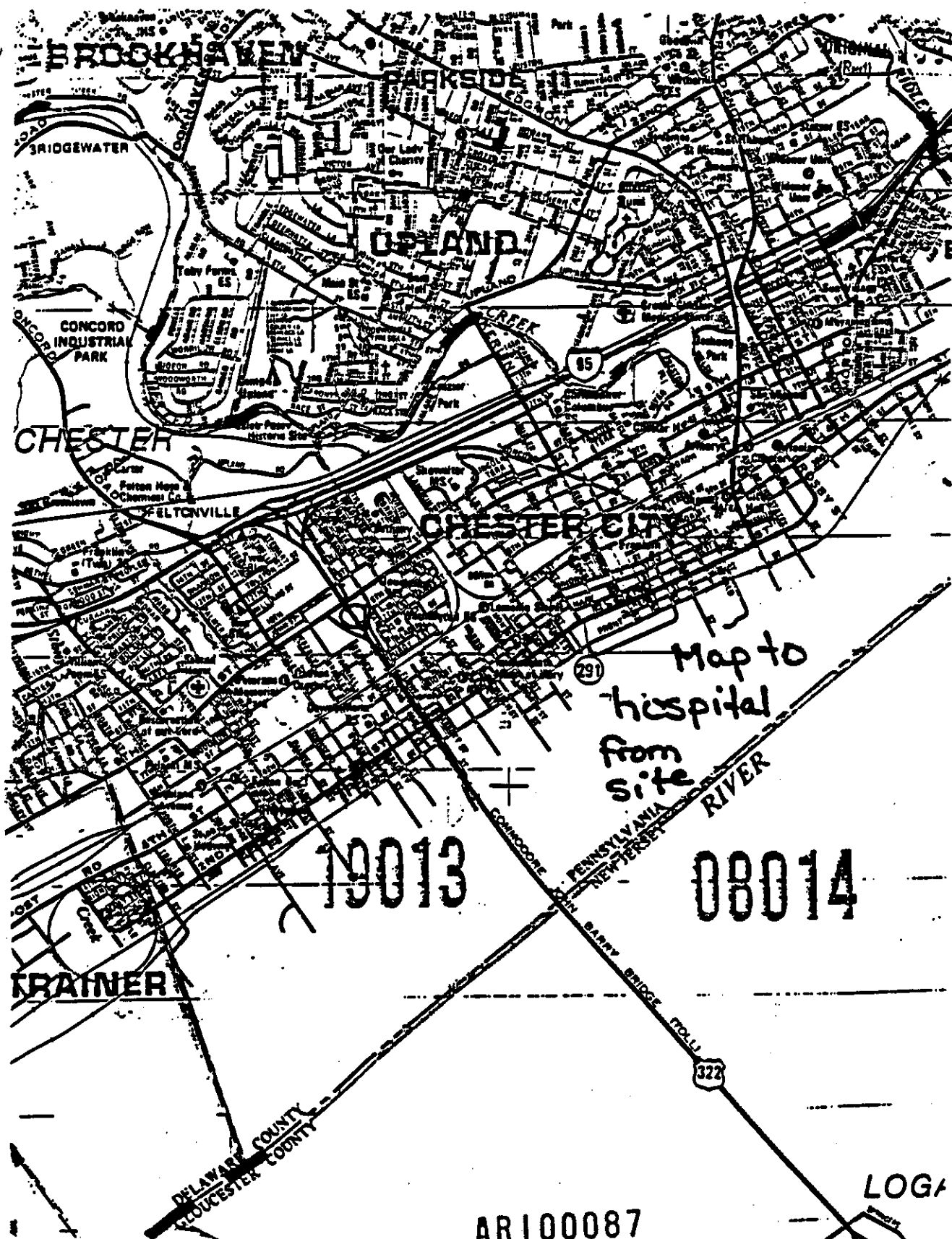
5 - monitoring wells

~~Hot Zone~~
Decon
Clean Zone

METRO CONTAINER CORPORATION SITE

Trainer,
Delaware Co., Pa.





10013

08014

AR100087

LOGA

SITE SAFETY PLAN ACKNOWLEDGMENT FORM

I have been informed and understand and will abide by the procedures set forth in the Safety and Health Plan and Amendments for the Metro Containers site.

Printed Name	Signature	Representing	Date
<u>Rita Sammons</u>	<u>Rita Sammons</u>	<u>TAT</u>	<u>9/14/88</u>
<u>Charles S. Dehai</u>	<u>Charles S. Dehai</u>	<u>Museclian</u>	<u>9-14-88</u>
<u>GREGORY DUKER</u>	<u>Gregory Duker</u>	<u>Guardian</u>	<u>9/14/88</u>
<u>Garrett Hui</u>	<u>Garrett Hui</u>	<u>GUARDIAN</u>	<u>9-19-88</u>
<u>John C. Wilson</u>	<u>John C. Wilson</u>	<u>Guardian</u>	<u>9-20-88</u>
<u>Mark P. Taylor</u>	<u>Mark P. Taylor</u>	<u>Guardian</u>	<u>9-20-88</u>
<u>Thomas Sweetman Jr</u>	<u>Thomas Sweetman Jr</u>	<u>Guardian</u>	<u>9-20-88</u>
<u>Kelly Boyle</u>	<u>Kelly Boyle</u>	<u>Guardian</u>	<u>9-20-88</u>
<u>Bob Caron</u>	<u>Bob Caron</u>	<u>Guardian</u>	<u>9-20-88</u>
<u>Allen J. Jones</u>	<u>Allen J. Jones</u>	<u>Guardian</u>	<u>9-20-88</u>
<u>LYNN WILKER</u>	<u>Lynn Wilker</u>	<u>EPA</u>	<u>9-20-88</u>
<u>Charles J. Dispeto</u>	<u>Charles J. Dispeto</u>	<u>EPA</u>	<u>9-21-88</u>
<u>Chris Wagner</u>	<u>Chris Wagner</u>	<u>TAT</u>	<u>9/24/88</u>
<u>Joseph A. DeAngelis</u>	<u>Joseph A. DeAngelis</u>	<u>TAT</u>	<u>9/19/88</u>
<u>ROBERT G. ROSELIUS</u>	<u>Robert G. Roselius</u>	<u>TAT</u>	<u>9/26/88</u>
<u>John E. Williams</u>	<u>John E. Williams</u>	<u>TAT</u>	<u>9/27/88</u>
<u>Alan Jackson</u>	<u>Alan Jackson</u>	<u>EPA</u>	<u>9/28/88</u>
<u>Bette J. Strange</u>	<u>Bette J. Strange</u>	<u>TAT</u>	<u>10/3/88</u>
<u>Carol Manning</u>	<u>Carol Manning</u>	<u>TAT</u>	<u>11/13/88</u>
<u>PENNIE CAARPEY</u> <u>Charles Kieckhefer</u> <u>Kevin Coom</u>	<u>as explained by</u> <u>OSC Foy</u>	<u>EPA</u>	<u>3/21/89</u>

AR100088

POLREP #1

METRO CONTAINER
DELAWARE COUNTY, TRAINER, PA
CERCLA REMOVAL RESPONSE

ATTN: ROBERT CARON AND TIM FIELDS

I. SITUATION (1000 HRS., 12/12/87):

- A. ON DECEMBER 11, 1987, AT 1330 HRS, EPA REGION III'S ERS WAS NOTIFIED BY EPA ENFORCEMENT STEUTEVILLE OF A POSSIBLE EMERGENCY SITUATION AT THE METRO CONTAINER CORPORATION LOCATED IN DELAWARE COUNTY, TRAINER, PA. NOTIFIED BY PADER OF A POTENTIALLY HAZARDOUS SITUATION, ENFORCEMENT HAD PERFORMED A VISUAL SITE INSPECTION OF THIS ACTIVE DRUM RECLAIMING FACILITY IN THE MORNING OF 12/11/87. ENFORCEMENT WAS CONCERNED OVER LEAKING DRUMS CONTAINING SLUDGE FROM THE FACILITY'S DRUM CLEANING PROCESSES AND REQUESTED THAT THE EPA ERS INSPECT THE SITE.
- B. AT 1515 HRS., 12/11/87, OSCs FOX AND JACKSON, EPA ENFORCEMENT STEUTEVILLE, AND TAT MEMBERS WILDER, DISCIULLO, AND MORRIS ARRIVED AT THE FACILITY TO MEET WITH COMPANY REPRESENTATIVES LEVY (PRESIDENT) AND MAZLO (CHAIRMAN OF THE BOARD) AND ALSO TO ASSESS SITE CONDITIONS.
- C. THE METRO CONTAINER FACILITY HAS BEEN AN ACTIVE DRUM RECYCLING/RECLAIMING FACILITY FOR APPROXIMATELY 20 YEARS. DURING ITS OPERATION HISTORY, THE FACILITY HAS GONE THROUGH SEVERAL OWNERS AND HAS HAD SEVERAL DIFFERENT NAMES. CURRENTLY KNOWN AS METRO CONTAINER CORPORATION, THE FACILITY ACCEPTS "RCRA EMPTY" DRUMS TO CLEAN AND RESELL THEM. THE WASTES FROM THESE DRUMS ARE EITHER INCINERATED OR ROUTED THROUGH A SLUDGE TREATMENT PROCESS. THE FACILITY SENDS ASH TO AN OFF SITE DISPOSAL FACILITY, AND HAD BEEN DISPOSING OF THEIR TREATED SLUDGE LIQUIDS (THROUGH AN AGREEMENT WITH THE LOCAL SEWER AUTHORITY) THROUGH THE LOCAL SEWER SYSTEM. THE REMAINING SLUDGE, NOT ACCEPTABLE FOR TREATMENT BY THE SEWAGE TREATMENT SYSTEM, WAS SENT FOR DISPOSAL AT THE SUMPTER LANDFILL IN SUMPTER, MICHIGAN. METRO CONTAINER CURRENTLY HOUSES APPROXIMATELY 60,000 UNRECLAIMED DRUMS ON THEIR PROPERTY. APPROXIMATELY SIX MONTHS AGO, THE FACILITY'S SLUDGE TREATMENT SYSTEM BEGAN HAVING OPERATIONAL DIFFICULTIES. THIS RESULTED IN A BUILDUP OF UNTREATED SLUDGE AT THE FACILITY. THIS SLUDGE WAS STORED ON-SITE IN OPEN LAGOONS AND IN UNSECURED DRUMS SENT TO THE FACILITY FOR RECLAMATION. UNABLE TO HANDLE THIS SLUDGE BUILDUP, THE COMPANY DECREASED THEIR RECLAIMING PROCESSES BY ONE-HALF APPROXIMATELY SIX WEEKS AGO. ACCORDING TO COMPANY REPRESENTATIVE LEVY (PRESIDENT) ALL SLUDGES PRODUCED

SINCE THEN HAVE BEEN SHIPPED TO THE SUMPTOR LANDFILL FOR DISPOSAL. BECAUSE OF FINANCIAL PROBLEMS, THE BUILDUP OF SLUDGE ACQUIRED BEFORE THE DECREASE IN PRODUCTION HAS BEEN UNABLE TO BE DISPOSED OF OR TREATED, AND REMAINS ON-SITE.

- D. UNABLE TO HANDLE THE BUILDUP OF WASTE AND UNABLE TO CONTINUE FULL SCALE OPERATIONS, THE METRO CONTAINER CORPORATION FILED FOR BANKRUPTCY (CHAPTER 11) ON DECEMBER 7, 1987. THE COMPANY HAS RECENTLY REQUESTED A LOAN TO ACQUIRE A NEW SLUDGE FILTRATION SYSTEM AND TO CONTINUE SHIPPING UNTREATED SLUDGE TO MICHIGAN. UNTIL THIS LOAN IS APPROVED THE FACILITY WILL BE CLOSED FOR OPERATIONS. ACCORDING TO REPRESENTATIVES LEVY AND MAZLO, FUNDS MAY BE AVAILABLE IN JANUARY. REPRESENTATIVES HOPE TO BEGIN OPERATIONS ON JANUARY 5, 1987.
- E. THE FACILITY FORMERLY OPERATED ON A 24 HOUR BASIS (TWO SHIFTS), FIVE DAYS A WEEK. THE COMPANY HAS NO FORMAL SECURITY PERSONNEL, AND THE FACILITY DOES NOT HAVE FENCING AROUND THE ENTIRE PROPERTY TO CONTROL ACCESS. METRO CONTAINER IS LOCATED IN AN INDUSTRIAL AREA, WITH OIL REFINERYS TO THE EAST AND WEST, RAILROAD LINES AND THE DELAWARE RIVER TO THE SOUTH, AND THE RESIDENTS OF TRAINER TO THE NORTHWEST. STONEY CREEK, A TRIBUTARY TO THE DELAWARE RIVER BORDERS THE EASTERN EDGE OF THE FACILITY PROPERTY. UNDER THE DIRECTION OF PADER, A RUNOFF PIPE FROM THE FACILITY INTO THE CREEK WAS BLOCKED OFF APPROXIMATELY ONE AND ONE-HALF YEARS AGO (ACCORDING TO COMPANY REPRESENTATIVE BUTLER).

II. ACTIONS TAKEN:

- A. UPON ARRIVAL ON-SCENE (FROM 1510 TO 1525 HRS.), OSCs FOX AND JACKSON, ENFORCEMENT STEUTEVILLE, AND TAT MEMBER WILDER MET WITH METRO CONTAINER PRESIDENT LEVY AND CHAIRMAN OF THE BOARD MAZLO TO DISCUSS THE FACILITY HISTORY AND CURRENT STATUS. COMPANY REPS EXPLAINED THE FACILITY'S CURRENT PREDICAMENT (REFER TO SITUATION B-D) AND EXPRESSED CONCERN OVER HAVING EPA INVOLVED IN ANY CLEANUP ACTION BEFORE THE COMPANY COULD PERFORM THIS THEMSELVES. BOTH REPRESENTATIVES ARE CONCERNED OVER POSSIBLE PR PROBLEMS CREATED BY AN EPA ACTION. WHEN ASKED IF TRAINER RESIDENTS HAD EXPRESSED CONCERN OVER FACILITY OPERATIONS, MAZLO STATED THAT BOROUGH REPRESENTATIVES HAD RECENTLY VISITED THE FACILITY, ALONG WITH PADER PERSONNEL.
- B. FROM 1530 TO 1615 HRS., OSCs, ENFORCEMENT, AND TAT, ACCOMPANIED BY COMPANY REPRESENTATIVE BUTLER, PERFORMED A SITE WALK-THROUGH AND AIR MONITORING (HNU). NO ORGANIC READINGS ABOVE BACKGROUND WERE DETECTED IN AREAS OF SLUDGE STORAGE (OPEN DRUMS AND LAGOONS) OR IN AREAS OF LEAKING OR SPILLED SLUDGE MATERIAL. SLUDGE MATERIAL APPEARED TO BE AN OILY SUBSTANCE. THIS MATERIAL WAS

STORED IN AN OPEN CEMENT LAGOON AND IN 55 GALLON, UNSECURED DRUMS. ACCORDING TO COMPANY REP BUTLER, THE DRUMS STORING THIS MATERIAL HAD NOT BEEN RECLAIMED BEFORE SLUDGE ADDITION. BECAUSE THE DRUMS ARE STORED UNPROTECTED FROM ENVIRONMENTAL WEATHERING, MANY WERE IN POOR CONDITION. MANY OF THE DRUMS STILL HAD LABELS OF THEIR ORIGINAL CONTENTS, AND MANY WERE UNCOVERED AND APPEARED PARTIALLY FILLED WITH RAIN WATER. ALTHOUGH NONE OF THE DRUMS OBSERVED WERE ACTIVELY LEAKING, THE AREAS WHERE THESE DRUMS ARE STORED HAS CONSIDERABLE OILY SLUDGE MATERIAL ON THE GROUND. THIS MATERIAL DID NOT APPEAR TO BE MIGRATING OFF-SITE AT THE TIME OF INSPECTION. THE SLUDGE MATERIAL IS CURRENTLY STORED IN AN ESTIMATED 500-1000 DRUMS.

- C. APPROXIMATELY 60,000 DRUMS ARE CURRENTLY BEING STORED ON FACILITY PROPERTY, AWAITING RECLAIMING. ACCORDING TO REPRESENTATIVE BUTLER, ALL DRUMS ON-SITE ARE "RCRA EMPTIES." WHEN ASKED (BY OSC FOX) WHAT THE COMPANY DID WITH DRUMS THAT ARE RECEIVED, BUT ARE NOT "EMPTY," REPRESENTATIVE BUTLER STATED THAT THESE DRUMS WERE SENT BACK. WHEN RECEIVED, ALL UNRECLAIMED OR "RAW" DRUMS ARE SORTED ACCORDING TO DRUM TYPE AND STORED OUTDOORS. THESE DRUMS ARE STORED IN PILES, ON THEIR SIDES THROUGHOUT THE FACILITY GROUNDS. AN HNU READING OF APPROXIMATELY 300 UNITS WAS DETECTED OVER THE OPEN BUNG OF A 55-GALLON DRUM LABELLED TOLUENE. IN ADDITION TO THESE DRUM PILES, APPROXIMATELY 10-15 TRAILERS WERE ON-SITE THAT CONTAINED "RCRA EMPTY" DRUMS. ACCORDING TO BUTLER, THESE TRAILERS WERE OWNED BY VARIOUS DRUM RECYCLING COMPANIES. ALL RECLAIMED (CLEANED) DRUMS ARE STORED IN THE TREATMENT PLANT UNTIL THEY ARE SOLD.
- D. ACCORDING TO FACILITY MAPS, FIVE MONITORING WELLS ARE LOCATED ON THE PROPERTY.
- E. FROM 1630 TO 1724 HRS., TAT SAMPLED SEVEN LOCATIONS AT THE SITE. SAMPLING INCLUDED THE FOLLOWING:
- 01) ASH PILE SOUTH OF TREATMENT PLANT
 - 02) LIQUID/SLUDGE IN CONTAINMENT AREA EAST OF HCL STORAGE TANKS USED IN SLUDGE TRT PROCESS
 - 03) LIQUID FROM STONEY CREEK AT FORMER DISCHARGE PIPE
 - 04) SLUDGE FROM LEAKING SLUDGE DRUMS TO WEST OF CONCRETE SLUDGE LAGOON
 - 05) SLUDGE IN CONCRETE LAGOON
 - 06) SLUDGE IN 55-GAL UNCOVERED DRUM, SOUTH OF CONCRETE LAGOON
 - 07) SLUDGE IN 55-GAL UNCOVERED DRUM, WEST OF CONCRETE LAGOON.

ENFORCEMENT STEUTEVILLE INFORMED COMPANY REPRESENTATIVE LEVY THAT HE WOULD BE GIVEN SPLITS OF ALL SAMPLES COLLECTED. LEVY STATED THAT THIS WOULD NOT BE NECESSARY. OSC JACKSON ACCOMPANIED TAT DURING SAMPLING. ALL SAMPLING WAS PERFORMED IN LEVEL "C" PROTECTION, WITH

SAMPLING LOCATION AIR MONITORING (HNU) PERFORMED. NO ORGANIC VAPORS WERE DETECTED ABOVE BACKGROUND.

F. DURING TAT SAMPLING, OSC FOX AND ENFORCEMENT STUDEVILLE DISCUSSED ASSESSMENT OBSERVATIONS WITH LEVY AND MAZLO. OSC FOX INFORMED METRO CONTAINER OFFICIALS THAT THE POOR HOUSEKEEPING OBSERVED COULD CONSTITUTE AN EPA REMOVAL ACTION IF ANALYTICAL RESULTS OF SAMPLES INDICATED A CONTAMINATION PROBLEM. THE OSC ALSO VOICED HIS CONCERN OVER THE COLLECTION OF OILY WASTE MATERIALS THAT COULD EASILY MIGRATE INTO STONEY CREEK AND THE DELAWARE RIVER.

G. EPA AND TAT DEPARTED THE FACILITY AT 1800 HRS.

III. FUTURE PLANS

- A. TAT TO SEND SAMPLES (SPECIAL PROJECTS) FOR PRIORITY POLLUTANT ANALYSIS AND EP TOXICITY LEECHATE ANALYSIS (ASH SAMPLE) ON 12/14/87. OSC REQUESTS THAT RESULTS BE AVAILABLE BY 12/18/87. THESE RESULTS ARE TO BE SHARED WITH METRO CONTAINER REPRESENTATIVES TO AID IN CLEANUP MEASURES.
- B. EPA ENFORCEMENT TO CONTINUE CONTACT WITH FACILITY REPRESENTATIVES, PADER, AND THE OSC TO ENSURE THAT A CLEANUP BEGINS AND IS IN-LINE WITH EPA REQUIREMENTS, BASED ON ANALYTICAL RESULTS.
- C. IF METRO CONTAINER IS UNABLE TO CLEANUP, EPA REGION III'S EMERGENCY RESPONSE SECTION MAY BE REQUESTED BY ENFORCEMENT TO INITIATE EMERGENCY CLEANUP ACTIONS.

DOUG FOX, OSC
ALAN JACKSON, JR. OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

AR100092

POLREP #2

METRO CONTAINER
DELAWARE COUNTY, TRAINER, PA
CERCLA REMOVAL RESPONSE

ATTN: ROBERT CARON AND TIM FIELDS

I. SITUATION (1530 HRS., 12/31/87):

A. ANALYTICAL RESULTS FROM TAT 12/11/87 SAMPLING RECEIVED AND REVIEWED.

B. SITE HAS BEEN REFERRED TO RCRA.

II. ACTIONS TAKEN:

A. ANALYTICAL RESULTS REVEALED A WIDE RANGE OF CONTAMINANTS AT ALL BUT STREAM SAMPLING LOCATIONS (REFER TO POLREP #1 FOR LOCATIONS). HOWEVER, CONCENTRATIONS WERE NOT HIGH ENOUGH TO INITIATE AN IMMEDIATE REMOVAL ACTION. THE OSC IS CONCERNED OVER THE LACK OF SITE SECURITY AND EASY ACCESS ONTO THE FACILITY PROPERTY.

B. SINCE THIS IS AN ACTIVE FACILITY (ONLY TEMPORARILY SHUT DOWN), THE OSC CONTACTED RCRA THIS DATE AND GAVE ALL RELEVANT DATA AND BACKGROUND MATERIAL ON THE SITE. IN ADDITION, THE OSC CONTACTED OSHA AND INFORMED THEM OF POSSIBLE WORKER SAFETY PROBLEMS AT THE FACILITY. PENNSYLVANIA BUREAU OF WASTE MANAGEMENT REPRESENTATIVE, BRIAN BOYD, WAS UPDATED ON SITE ACTIVITIES THIS DATE.

III. FUTURE PLANS:

A. TAT AWAITING FLAMMABILITY RESULTS OF LAGOON SAMPLE.

B. RCRA TO COORDINATE WITH EPA ENFORCEMENT TO ENSURE THAT A CLEANUP BEGINS AND IS IN-LINE WITH EPA REQUIREMENTS.

C. IF METRO CONTAINER IS UNABLE TO CLEANUP, EPA REGION III'S EMERGENCY RESPONSE SECTION MAY BE REQUESTED BY ENFORCEMENT TO INITIATE EMERGENCY CLEANUP ACTIONS.

DOUG FOX, OSC
ALAN JACKSON, JR. OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

AR100093

To: ERD/OERR (EPA5511)
To: RRC (EPA9374)
From: S.JARVELA (EPA9341) Delivered: Thu 2-June-88 14:20 EDT Sy
(55)
Subject: POLREP 3 METRO CONTAINER
Mail Id: IPM-163-880602-129010663

POLREP 43
METRO CONTAINER
DELAWARE CO., TRAINER, PA.
CERCLA REMOVAL RESPONSE

ATTN: STEVE JARVELA AND TIM FIELDS

I. SITUATION (1500 hrs. 6/2/88)

- A. DUE TO A REPORTED SPILL ON 2/12/88 THE USCG COTP PHILADELPHIA REQUESTED THE OSC TO PERFORM SAMPLING AND DETERMINE IF WASTES WERE MIGRATING OFF SITE FROM THE METRO FACILITY. OFF SITE SAMPLING WAS CONDUCTED ON 2/19/88, THE ANALYTICAL RESULTS INDICATED THAT SOME WASTE WAS MIGRATING FROM THE FACILITY DURING PERIODS OF RAIN.
- B. CERCLA ENFORCEMENT REFERRED THIS SITE TO THE REMOVAL SECTION DUE TO THE INABILITY OF METRO CONTAINER CORP. TO UNDERTAKE REMOVAL ACTIONS TO MITIGATE THE THREAT TO THE ENVIRONMENT POSED BY THE UNSECURED FASHION THE WASTES ARE STORED AT THIS FACILITY.
- C. REGIONAL EXTRAMURAL FUNDS ARE AT CRITICALLY LOW LEVELS, THE ACTION MEMO IS BEING DELAYED BY THE SUPERFUND BRANCH CHIEF, REMOVAL ACTIONS CANNOT BE UNDERTAKEN UNTIL SUFFICIENT REGIONAL FUNDS BECOME AVAILABLE.

II. ACTIONS TAKEN

- A. ON 5/9/88 THE OSC SUBMITTED THE ACTION MEMO INTO CONCURRENCE REQUESTING AUTHORIZATION TO EXPEND FUNDS TO CONTROL AND STABILIZE THE OFF SITE MIGRATION AND ERECT A FENCE TO PREVENT THE DIRECT CONTACT THREAT. REGIONAL PRIORITIES HAVE DELAYED REMOVAL ACTIONS AT THE METRO CONTAINER SITE, STABILIZATION CANNOT BEGIN UNTIL FUNDS ARE MADE AVAILABLE.
- B. CERCLA ENFORCEMENT SECTION HAS BEEN CONTINUING TO PURSUE PRP'S TO UNDERTAKE REMOVAL ACTIONS AT THIS SITE, TO DATE NO PRP'S HAVE COME FORWARD TO BEGIN ANY ACTIONS AT THE FACILITY.

III. FUTURE PLANS

- A. THE OSC TO IMMEDIATELY BEGIN REMOVAL ACTIONS AT THIS SITE WHEN FUNDS ARE MADE AVAILABLE.

DOUGLAS P. FOX, OSC
US EPA REGION III
PHILADELPHIA, PA.

AR100094

POLREP #4
METRO CONTAINER
CERCLA REMOVAL
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA AND TIM FIELDS
CC: CHARLES KLEEMAN

I. SITUATION (1300 HOURS, 9/9/88):

A. THE METRO CONTAINER SITE RECEIVED FUNDING (\$ 208,800) ON 8/26/88, TO IMPLEMENT SITE STABILIZATION. REMOVAL ACTIONS WILL INCLUDE CONTROLLING SITE ACCESS AND MITIGATING CONTAMINANT MIGRATION INTO STONEY CREEK. MINI ERCS 8A CONTRACTOR, ENVIRONMENTAL HEALTH AND RESEARCH TESTING (EHRT--LEXINGTON, KY), WILL BE EMPLOYED FOR THIS REMOVAL.

B. THE OSC CONTINUES COORDINATION WITH EPA ENFORCEMENT (LARRY FAULKIN) ON PRP ISSUES. THE OSC WILL ACCOMPANY FAULKIN TO A PRP STEERING COMMITTEE MEETING ON 9/13/88, TO DISCUSS EPA'S REQUIREMENTS FOR SITE CLEANUP. THE OSC AND ENFORCEMENT INTEND TO GIVE THE PRPS UNTIL 9/19/88 TO SIGN A CONSENT ORDER. IF THE ORDER IS NOT SIGNED BY 9/19/88, THE OSC WILL MOBILIZE TAT AND ERCS TO THE SITE THAT DATE.

II. ACTIONS TAKEN:

A. THE OSC HAS NOTIFIED EPA ENFORCEMENT, ORC, AND OPA OF THE INTENDED DATE OF MOBILIZATION. PADER REPRESENTATIVE (BRIAN BOYD) WAS CONTACTED BY THE OSC THIS DATE AND UPDATED ON SITE STATUS AND PLANS.

B. A DELIVERY ORDER (\$10,000) FOR MINI ERCS' EHRT WAS ISSUED ON 9/8/88. THE RESPONSE MANAGER AND FOREMAN WERE DIRECTED TO MEET THE OSC ON SCENE AT 0700 HOURS ON 9/12/88, TO CONDUCT A SITE ASSESSMENT TO FAMILIARIZE THE CONTRACTOR WITH THE SITE. A REMOVAL TDD WAS OPENED FOR TAT, WHO WILL ALSO BE ON SITE 9/12/88.

III. FUTURE PLANS:

A. OSC TO ATTEND PRP STEERING COMMITTEE MEETING ON 9/12/88.

B. OSC, TAT, AND ERCS TO BE ON SCENE AT 0700 HOURS, 9/12/88, FOR SITE WALKTHROUGH AND OPERATIONAL MEETING.

C. DEPENDING ON PRP SIGNATURE OF THE CONSENT ORDER, THE OSC WILL BEGIN SITE REMOVAL OPERATIONS 9/19/88 (MOBILIZATION).

LYNN WILDER, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

Lynn Wilder

AR100095

To: ERD/OERR (EPA5511)
To: OPA/REG.III (EPA9315)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Thu 15-Sep-88 17:01 EDT Sys 1
Subject: METRO CONTAINER SITE, TRAINER, PA, POLREP #5
Mail Id: IPM-163-880915-153170668

POLREP #5
METRO CONTAINER SITE
CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA AND TIM FIELDS
CC: CHARLES KLEEMAN

I. SITUATION (1800 HOURS, 9/13/88):

A. PENDING THE SIGNING OF A CONSENT ORDER BY 9/19/88, THE OSC INTENDS TO MOBILIZE TAT AND MINI ERCS (EHRT) ON 9/19/88, AND BEGIN SITE STABILIZATION MEASURES. AFTER MEETING WITH THE PRP STEERING COMMITTEE, THIS DATE, THE OSC IS QUITE SURE THAT REMOVAL OPERATIONS BY EPA WILL BE INITIATED. RESULTS OF THE MEETING WITH THE PRP COMMITTEE (REFER TO BULLET II.B.) REVEAL THAT MANY ENFORCEMENT AND LEGAL ISSUES MUST BE RESOLVED BEFORE A CONSENT AGREEMENT CAN BE REACHED.

B. DISCREPANCIES IN THE CONTRACT WITH EHRT HAVE BEEN RECOGNIZED BY FAS (HENRY) AND CONTRACT ADMIN (MURPHY). THESE DISCREPANCIES HAVE BEEN BROUGHT TO EHRT'S ATTENTION AND MUST BE RESOLVED BEFORE MOBILIZATION TO THE METRO CONTAINER SITE.

II. ACTIONS TAKEN:

A. FROM 0700 TO 0830 HOURS, 9/12/88, THE OSC AND TAT MET ON SITE WITH EHRT REPRESENTATIVES (ORMS AND GULATI). AFTER DISCUSSING THE ERCS SCOPE OF WORK, THE ABOVE MENTIONED TOURED THE SITE (ACCOMPANIED BY A METRO ENTERPRISES EMPLOYEE) TO ALLOW THE MINI ERCS CONTRACTOR TO ASSESS SITE CONDITIONS. THE OSC WAS INFORMED BY EHRT THAT ALL EQUIPMENT AND MATERIAL WOULD BE SUBCONTRACTED. THE OSC EXPLAINED THAT THE INTENTIONS FOR MOBILIZATION WOULD HINGE UPON THE SIGNING OF A CONSENT AGREEMENT BY THE PRPS BY 9/19/88. THE OSC TASKED TAT TO CREATE A DESIGN FOR THE BERM TO BE INSTALLED ALONG THE SITE AREA THAT BORDERS STONEY CREEK (TO BE COMPAIRED WITH MINI ERCS DESIGN).

B. THE OSC AND TAT ACCOMPANIED REMOVAL ENFORCEMENT REPRESENTATIVE (FAULKIN) TO A PRP STEERING COMMITTEE THAT BEGAN AT 1000 HOURS THIS DATE. MEMBERS PRESENT INCLUDED PARTIAL SITE OWNER (MASLOW) AND NUMEROUS REPRESENTATIVES OF COMPANIES (AND ATTORNEYS) THAT HAVE SENT RCRA EMPTY DRUMS TO THE SITE FOR RECLAMATION. AS THE METRO ENTERPRISE CORP INTENDS TO DECLARE BANKRUPTCY ON 9/23/88, SEVERAL OF THE PRPS PRESENT AT THIS MEETING ARE PROPOSING TO PERFORM THE SITE CLEANUP (PER EPA CONSENT AGREEMENT) AND THEN RESTORE BOTH THE METRO CONTAINER AND METRO ENTERPRISES FACILITIES INTO ONE DRUM RECLAIMING OPERATION. A QUESTION WAS RAISED DURING THE MEETING AS TO THE OPERATIONS PERFORMED ON SITE UNDER PREVIOUS OWNERSHIP. ONE INDIVIDUAL HAD BEEN INFORMED THAT AN OPEN ON SITE LAGOON HAD ONCE BEEN USED (BY A FORMER OWNER/OPERATOR). BEFORE A CONSENT AGREEMENT IS REACHED, THE PRPS REQUESED EPA ENFORCEMENT TO ADDRESS THE

AR100096

FOLLOWING: WHETHER THE BANK THAT CURRENTLY HAS A LEIN ON THE FACILITY WILL ALLOW THE PRPS TO PURCHASE THE PROPERTY; WHAT WILL OCCUR IF FORMER SITE OWNERS/OPERATORS HAVE CONTRIBUTED SURFACE SOIL AND SUB SURFACE SOIL AND WATER CONTAMINATION; AND WHAT AQUIFER CONTAMINATION ISSUES MAY THE EPA (REMEDIAL) AND PADER REQUIRE THE PRPS TO ADDRESS. AT THE CLOSE OF THIS MEETING (1330 HOURS) IT WAS DECIDED THAT THE STEERING COMMITTEE WILL MEET WITH ENFORCEMENT AND ORC (AT EPA) ON 9/19/88, TO FURTHER DISCUSS THE CONSENT AGREEMENT.

C. AT 1640 HOURS THIS DATE, THE OSC WAS CONTACTED BY FACILITY OWNER (PARTIAL) MASLOW. HE STATED THAT HE WAS REFERRED TO THE OSC BY EPA ENFORCEMENT REGARDING HIS PROPOSAL TO PERFORM ON SITE TREATMENT (INCINERATION VIA METRO ENTERPRISES) OF APPROXIMATELY 15,000 DRUMS ON SITE WITH NO RECLAMATION VALUE. MR. MASLOW STATED THAT HIS INTENTIONS WERE TO PERFORM THIS OPERATION BEFORE THE 9/23/88 BANKRUPTCY HEARING, IN ORDER TO SAVE MONEY AND ELIMINATE ADDITIONAL SOIL CONTAMINATION. HE ASSURED THE OSC THAT AFTER THE MATERIAL IN THESE DRUMS WAS REMOVED/INCINERATED, THAT THE DRUMS WOULD BE CLEAN AND SENT TO A SCRAP METAL YARD. THE OSC CONTACTED ENFORCEMENT (FAULKIN) REGARDING THIS CONVERSATION. FAULKIN INFORMED THE OSC THAT HE HAD REFERRED MASLOW TO THE REMOVAL SECTION REGARDING AN EARLIER CALL IN WHICH MASLOW HAD EXPRESSED INTEREST IN PERFORMING SOME SORT OF REMOVAL OPERATIONS AS A MINI ERCS SUB-CONTRACTOR. FAULKIN SAID THAT NOTHING WAS DISCUSSED THAT WAS EVEN SIMILAR TO MASLOW'S PROPOSAL TO THE OSC. FAULKIN AGREED THAT MASLOW'S PROPOSAL TO THE OSC WAS AN ENFORCEMENT ISSUE, AND THAT HE WOULD CONTACT THIS PRP.

III. FUTURE PLANS:

A. DEPENDING ON PRP SIGNATURE OF THE CONSENT ORDER, THE OSC WILL BEGIN SITE REMOVAL OPERATIONS 9/19/88 (MOBILIZATION).

B. THE OSC IS TO CONTACT PADER REP (BOYD) TO OBTAIN MORE IN-DEPTH MATERIAL ON SITE HISTORY AND PREVIOUS SITE OPERATIONS.

C. THE OSC WILL CONTINUE TO UPDATE EPA OPA, ORC, AND ENFORCEMENT ON SITE STATUS.

LYNN WILDER, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

AR100097

sent EMAIL 9/20/88

To: ERD/OERR (EPA5511)
To: OPA/REG.III (EPA9315)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Wed 21-Sep-88 7:32 EDT S
Subject: METRO POLREP 6
Mail Id: IPM-163-880921-067831212

POLREP #6

METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA AND TIM FIELDS
CC: CHARLES KLEEMAN

I. SITUATION (1800 HOURS, MONDAY, SEPTEMBER 19, 1988)

A. MOBILIZATION THIS DATE AT 0800 HOURS BY OSC, TAT AND MINI-ERCS CONTRACTOR (GUARDIAN). PROBLEMS WITH THE ORIGINAL MINI-ERCS CONTRACTOR, ENVIRONMENTAL HEALTH RESEARCH AND TESTING (EHR&T), INCLUDING LACK OF GENERAL LIABILITY INSURANCE COVERAGE, AND LACK OF AN EPA APPROVED RESPONSE MANAGER LED TO THE REPLACEMENT OF EHR&T WITH GUARDIAN.

B. DURING A SITE WALKTHROUGH WITH TAT AND MINI-ERCS, THE OSC NOTED SIGNIFICANT DETERIORATION IN THE DRUMS CONTAINING SLUDGE WASTE (APPROXIMATELY 3000), SINCE THE LAST SITE ASSESSMENT IN JANUARY, 1988. THESE DRUMS ARE LEAKING FROM THE SIDES, BOTTOMS AND SOME ARE ACTIVELY OVERFLOWING. THE DRUMS ARE LOCATED IN LOW LYING AREA OF THE SITE AND ARE ADJACENT TO STONEY CREEK. ANY PRECIPITATION CAUSES RUNOFF OF SLUDGE MATERIAL INTO STONEY CREEK. IN ADDITION TO DRUMS, SLUDGE WASTE IS STORED IN NUMEROUS LEAKING TANKS, LAGOONS AND EMERGENCY CONTAINMENT STRUCTURES. BECAUSE OF THE LOCATION OF THE DRUMS AND TANKS, CONSTRUCTION OF THE BERM WILL BE ALMOST IMPOSSIBLE WITHOUT MOVING DRUMS. THE DRUMS REQUIRED TO BE MOVED ARE IN SUCH POOR CONDITION, THEY WILL DISINTIGRATE WHEN LIFTED. IN ADDITION, WHILE BERM CONSTRUCTION WILL MITIGATE SURFACE CONTAMINANT RUNOFF INTO STONEY CREEK, IT WILL ALSO CREATE AN INCREASE IN STANDING LIQUIDS IN THE DRUM AREA. THIS WILL ACCELERATE DRUM DETERIORATION. OPTIONS FOR REDUCTION OF RUNOFF ARE BEING EXPLORED. THE OSC FEELS THAT UNLESS THE DRUM, TANK AND LAGOON MATERIAL IS BETTER CONTAINED OR REMOVED, STABILIZATION WILL NOT BE EFFECTIVE. ADDITIONAL FUNDING WILL BE REQUIRED TO PERFORM AN EFFICIENT REMOVAL.

C. PERSONNEL ON SCENE:

EPA- 1

TAT- 2

MINI-ERCS- 5

D. WEATHER: OVERCAST, WARM, TEMPERATURES IN THE LOW 80'S.

E. ESTIMATED COSTS TO DATE (9/19/88):

	COSTS	CEILING (K)
EPA	\$330	9
EPA INDIRECT	600	21
TAT	1500	20
MINI-ERCS	5000	135

TOTAL	\$7430	185

AR100098

II. ACTIONS TAKEN

A. MOBILIZATION BY MINI-ERCS CONTRACTOR, GUARDIAN, THIS DATE 0800 HOURS. GUARDIAN MOBILE COMMAND BUS ONSITE TO PROVIDE WORKPLACE FOR OSC AND CONTRACTORS DURING INITIAL PHASE OF REMOVAL PROJECT.

B. OSC CONTACTED EPA/ENFORCEMENT (FALKIN), FOR UPDATE ON PRP MEETING WHICH WAS HELD AT EPA THIS DATE. FALKIN INFORMED OSC THAT THERE IS LITTLE CHANCE OF PRP'S REACHING A CONSENT AGREEMENT WITH EPA. THE PRP STEERING COMMITTEE MEMBERS PRESENT OPTED FOR EPA RESPONSIBILITY FOR SITE CLEANUP.

C. OSC, TAT AND MINI-ERCS PERSONNEL PERFORMED ASSESSMENT OF SITE TO DETERMINE PLACEMENT OF FENCE AND SPECIFICATIONS OF BERM. THE OSC DIRECTED TAT TO DESIGN BERM WHILE MINI-ERCS CONTRACTOR BEGINS CONSTRUCTION OF THE FENCE. FENCE NOW IN PLACE IS TO BE REPAIRED AND NEW FENCING TO BE ADDED WHERE NEEDED. BECAUSE FENCING CONSTRUCTION WOULD BE DIFFICULT ALONG THE PROPERTY LINE BORDERING STONEY CREEK, THE OSC WILL ATTEMPT GETTING BP'S PERMISSION TO CONNECT TO NEIGHBORING REFINERY ACROSS STONEY CREEK.

D. TAT CONTACTED TRAINER BOROUGH LEPC (SHERTENLIEB) TO ASK FOR BOROUGH COOPERATION IN DETERMINING METRO PROPERTY BOUNDARIES AND LOCATION OF UTILITY LINES BEFORE FENCING OPERATIONS BEGIN. TAT WAS REFERRED TO MAYOR COLE OF TRAINER, WHO WILL BE CONTACTED 9/20/88.

E. LEPC (SHERTENLIEB) ARRIVED ON-SCENE THIS DATE TO DISCUSS THE TOWNSHIP'S CONCERNS WITH THE SITE AND FOR AN UPDATE OF EPA PLANS. SHERTENLIEB OFFERED HIS ASSISTANCE WITH COORDINATION WITH LOCAL OFFICIALS AND RESIDENTS.

F. OSC TASKED TAT TO DEVELOP A SITE COMPREHENSIVE SAMPLING PLAN TO FURTHER CHARACTERIZE THE SITE.

G. OSC REQUESTED ENGINEERING PLANS OF THE SITE FROM METRO ENTERPRISE PRESIDENT (MASLOW). HE REFERRED THE OSC TO METRO CONTAINER PRESIDENT (LEVY), WHO COULD NOT BE REACHED THIS DATE.

III. FUTURE PLANS

A. FENCING TO ARRIVE ONSITE 1200 HOURS, 9/20/88. MINI-ERCS PREPARE AREA FOR FENCING CONSTRUCTION.

B. MAYOR OF TRAINER TO BE CONTACTED CONCERNING LOCATION OF UTILITIES AND METRO BOUNDARY LINES.

C. BP, INC. TO BE CONTACTED CONCERNING FENCING CONNECTION TO BE MADE AT METRO-BP PROPERTY LINE.

D. TAT TO BEGIN SURVEYING SITE REQUIRED FOR DESIGN OF BERM ALONG METRO PROPERTY LINE.

E. TAT TO PERFORM ADDITIONAL SAMPLING AT SITE.

F. OSC TO UPDATE OPA (LEYDEN) ON REMOVAL AND PRP STATUS.

G. BANKRUPTCY HEARING FOR METRO ENTERPRISES SCHEDULED FOR 9/23/88.

LYNN WILDER, OSC
EPA REGION III
PHILADELPHIA, PA

AR100099

To: ERD/OERR (EPA5511)
To: OPA/REG.III (EPA9315)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Thu 22-Sep-88 10:39 EDT
Subject: METRO POLREP 7
Mail Id: IPM-163-880922-095851168

POLREP #7

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA AND TIM FIELDS

CC: CHARLES KLEEMAN

I. SITUATION (TUESDAY, SEPTEMBER 20, 1988)

A. SITE ACCESS RESTRICTION OPERATIONS (MINI-ERCS) ARE CURRENTLY UNDERWAY. DESIGNS FOR RESTRICTION OF SURFACE OFF SITE MIGRATION ARE BEING DEVELOPED. COMMAND POST SETUP NEAR COMPLETION.

B. PERSONNEL ON SCENE: EPA-2, TAT-2, MINI-ERCS-7, PADER- 1.

C. WEATHER: OVERCAST, WARM, TEMPERATURES IN THE 80'S.

D. ESTIMATED COSTS TO DATE (COB 9/20/88):

	EST COST TO DATE	CEILING (K)
EPA	\$ 800	\$ 9,000
EPA INDIRECT	1500	21,000
TAT	3000	20,000
MINI-ERCS	8000	135,000
-----		-----
TOTAL	13300	\$185,000

E. EPA ENFORCEMENT (FAULKIN), ONSITE TO VIEW SITE ACTIVITIES.

F. RUSS COLE, MAYOR OF TRAINER BOROUGH, ON SITE TO RECEIVE UPDATE FROM OSC ON SITE ACTIVITIES.

G. BRIAN BOYD, PA DER, ON SITE TO CONSULT WITH OSC ON REMOVAL PROJECT AND VIEW SITE OPERATIONS.

II. ACTIONS TAKEN

A. FENCING AND POLES DELIVERED TO SITE 1200 HOURS THIS DATE. MINI-ERCS CONTRACTOR PREPARED BOTH EAST AND WEST ENDS OF PROPERTY BY CLEARING BRUSH AND DEBRIS FOR FENCE INSTALLATION.

B. THE PENNSYLVANIA ONE-CALL SYSTEM WAS UTILIZED THIS DATE TO INFORM UTILITY COMPANIES IN THE AREA OF PLANNED DIGGING OPERATIONS AT THE METRO FACILITY. PHILADELPHIA ELECTRIC, ELECTRIC AND GAS DIVISIONS, AND TRANSCON SENT REPRESENTATIVES TO SITE TO SPECIFY WHERE THEIR UNDERGROUND LINES RUN. SEVERAL OTHER UTILITIES, INCLUDING BELL TELEPHONE AND THE CHESTER WATER COMPANY, CALLED TO CONFIRM THAT NO UNDERGROUND LINES BELONGING TO THEM WOULD INTERFERE IN FENCE POST INSTALLATION OPERATIONS.

C. BP REFINERY SAFETY MANAGER JOHN WARD ON SITE THIS DATE TO VIEW AREA WHERE METRO AND BP FENCES WOULD BE CONNECTED. PERMISSION WAS GIVEN BY WARD FOR THIS CONNECTION. HE VOICED CONCERN OVER FENCE ALONG EAST END OF THE PROPERTY BLOCKING ACCESS TO BP'S REAR GATE AND WAS ASSURED IT WOULD NOT DO SO.

D. DECISION MADE BY OSC TO DROP POWER LINES FROM POLE RATHER THAN USE EXISTING METRO LINES DUE TO PROBLEMS WITH UTILITIES BEING TURNED OFF WHEN METRO ENTERPRISES DECLARES BANKRUPTCY, AS WELL AS POSSIBLE BILLING PROBLEMS. THIS WILL DELAY PERMANENT

POWER HOOKUP FOR TWO DAYS.

E. TAT BEGAN SURVEYING SITE FOR DESIGN OF BERM TO CONTROL SURFACE SLUDGE RUNOFF.

F. TAT COMPLETED SAMPLING PLAN FOR FURTHER CHARACTERIZATION FOR OSC REVIEW.

G. OSC RECEIVED BLUEPRINTS OF PROPERTY FROM METRO CONTAINER PRESIDENT (LEVY). BLUEPRINTS WILL BE RETURNED WHEN REPLICATED (TAT).

III. FUTURE PLANS

A. FENCING CONSTRUCTION TO CONTINUE. FENCE INSTALLATION TIME FRAME DEPENDENT ON SOIL TYPE AND DIFFICULTY OF DRIVING FENCE POSTS.

B. TAT TO CONTINUE SURVEYING OF SITE AND BERM DESIGN.

C. OSC TO UPDATE OPA (LEYDEN) ON REMOVAL STATUS.

D. BANKRUPTCY HEARING FOR METRO ENTERPRISES SCHEDULED FOR 9/23/88.

E. TAT TO PERFORM ADDITIONAL SAMPLING, TENTATIVELY SCHEDULED FOR 9/23/88.

F. OSC TO CONTACT OSC OF RECORD, FOX, TO DISCUSS POTENTIAL PROBLEMS WITH BERM AND ITS EFFECTIVENESS AGAINST SURFACE SLUDGE RUNOFF.

LYNN WILDER, OSC
EPA REGION III
PHILADELPHIA, PA

AR100101

To: ERD/OERR (EPA5511)
To: OPA/REG.III (EPA9315)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Thu 22-Sep-88 13:22 EDT
Subject: METRO POLREP 8
Mail Id: IPM-163-880922-120430012

POLREP #8

METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA AND TIM FIELDS
CC: CHARLES KLEEMAN

I. SITUATION (1900 HOURS, 9/21/88)

A. SITE ACCESS RESTRICTION OPERATIONS (MINI-ERCS) CONTINUE.
DESIGNS FOR RESTRICTION OF SURFACE OFF SITE MIGRATION ARE BEING
DEVELOPED.

B. PERSONNEL ON SCENE: EPA-5, TAT-4, MINI-ERCS-7, LEPC-1

C. WEATHER: CLOUDY AND COOL, CHANCE OF THUNDERSTORMS.

D. ESTIMATED COSTS TO DATE (COB 9/21/88):

	EST COST TO DATE	CEILING
EPA	\$ 1,400	\$ 9,000
EPA INDIRECT	2,500	21,000
TAT	5,000	20,000
MINI-ERCS	30,000	135,000
	-----	-----
TOTAL	\$ 38,900	\$185,000

E. TELEPHONE SYSTEM HAS BEEN INSTALLED. HOOK-UP OF ELECTRICITY
IS EXPECTED 9/22/88.

F. LEPC (SHERTENLIEB) ONSITE TO SET UP MEETING BETWEEN OSC AND
LOCAL TRAINER BOROUGH OFFICIALS.

II. ACTIONS TAKEN:

A. MINI-ERCS PERSONNEL INSTALLED POLES FOR PERIMETER FENCING
ALONG WEST END OF THE SITE THIS DATE. CONSIDERABLE DIFFICULTY WAS
EXPERIENCED IN POLE INSTALLATION ACROSS STONEY CREEK.

B. METRO REPRESENTATIVES INFORMED OSC WILDER THAT A DENSE
AMOUNT OF TRAFFIC MOVING ON AND OFF SITE CAN BE EXPECTED DURING
THE NEXT FEW DAYS DUE TO ANTICIPATED LIQUIDATION OF THE COMPANIES.
EPA SECURITY WAS INSTRUCTED BY THE OSC TO PERFORM PERIMETER
WALKTHROUGHS THROUGHOUT THE NIGHT. EMPTY DRUMS AND OTHER PROPERTY
BELONGING TO MR. WESTFALL WILL BE REMOVED. DUE TO THESE
COMPLICATIONS, COMPLETION OF FENCING IN THE SOUTHEAST CORNER OF
THE PROPERTY WILL BE POSTPONED UNTIL FRIDAY, 9/30/88.

C. TAT PERFORMED AIR MONITORING THROUGHOUT THE SITE. NO
AMBIENT AIR READINGS ABOVE BACKGROUND WERE DETECTED.

D. TAT INVESTIGATED THE TERRAIN AT THE REAR OF THE SITE TO
DETERMINE POSSIBLE DESIGNS FOR BUILDING A BERM. THEY ENCOUNTERED
THICK, HEAVY BRUSH IN THEIR PATH. WHILE CUTTING THROUGH THIS
GROWTH, TAT CAME UPON NUMEROUS DRUMS WHICH HAD APPARENTLY FALLEN
FROM A NEARBY STACK. TAT WAS UNABLE TO SAFELY CREATE A PATH
ALONG THE ENTIRE SITE BOUNDARY ALONG THE CREEK.

E. TAT PERFORMED SURVEYING NECESSARY TO DESIGN A BERM WHICH
WOULD PREVENT SURFACE CONTAMINATION RUNOFF FROM MIGRATING INTO
STONEY CREEK. DESIGN OF BERM IS EXPECTED TO BE COMPLETED BY 9/24/88.

F. BUILDING INSPECTOR (HARRY BECK) WAS ON SCENE AND INQUIRED ABOUT A PERMIT TO CONSTRUCT A FENCE. HE WAS UNDER THE IMPRESSION THAT METRO ENTERPRISES/CONTAINER WAS INSTALLING THE FENCE. THE OSC EXPLAINED THAT THE EPA WAS INSTALLING THE FENCE AS PART OF THIS SUPERFUND REMOVAL PROJECT. BECK STATED THAT NO PERMIT WOULD BE REQUIRED. MR. BECK INFORMED THE OSC THAT HE WAS A MEMBER OF THE TRAINER FIRE DEPARTMENT AND THAT THE FIRE COMPANY HAS RESPONDED TO NUMEROUS FIRES AT THE METRO FACILITY. FIRES USUALLY OCCURED AT NIGHT OR DURING THE WEEKEND, WHEN THE SITE WAS UNATTENDED, ACCORDING TO BECK, FIRES HAVE BEEN IN THE INCINERATOR, SLUDGE TREATMENT PROCESS AREA AND IN OUTSIDE AREAS OF SLUDGE STORAGE AND RCRA EMPTY DRUM STORAGE.

G. OSC CONTACTED OSC OF RECORD, FOX, TO INFORM HIM OF CONCERNS WITH BERM AND ITS EFFECTIVENESS AGAINST STOPPING SURFACE SLUDGE RUNOFF. THE OSC EXPLAINED THAT IN ORDER TO INSTALL A PERMANENT BERM, A CONSIDERABLE NUMBER OF SLUDGE FILLED DRUMS WOULD REQUIRE MOVEMENT. ALL DRUMS WOULD REQUIRE OVERPACKING, WITH CONSIDERABLE DRUM BREAKAGE ANTICIPATED. PRESENT FUNDS DO NOT ALLOW FOR TIME AND MATERIALS NECESSARY FOR PERMANENT OFFSITE MIGRATION ABATEMENT. SUBSURFACE RUNOFF WILL REQUIRE EXTENSIVE MOVING AND OVERPACKING OF DRUMS. OSC FOX AGREED THAT AFTER ADDITIONAL SAMPLING (TAT) RESULTS ARE RECEIVED, ADDITIONAL FUNDS WILL BE REQUESTED TO PERMANENTLY ADDRESS THE SITE. THE OSC CONTACTED ASSISTANT BRANCH CHIEF (CARNEY) AND UPDATED HIM ON SITE STATUS AND PLANS.

III. FUTURE PLANS

A. FENCING CONSTRUCTION TO CONTINUE ON EAST END OF PROPERTY.

B. TAT TO CONTINUE BERM DESIGN. THIS IS EXPECTED TO BE COMPLETED 9/24/88.

C. TAT TO PERFORM ADDITIONAL SAMPLING, TO FURTHER CHARACTERIZE SITE, TENTATIVELY SCHEDULED FOR 9/26/88.

D. MEETING BETWEEN OSC AND TRAINER BOROUGH OFFICIALS TENTATIVELY SCHEDULED FOR 1900 HOURS, 9/23/88. OSC TO CONTACT BOROUGH MAYOR (COLE) 9/22/88, FOR CONFIRMATION.

E. OSC TO CONTACT ORC (AIL) CONCERNING THE BANKRUPTCY HEARING AND POSSIBLE METRO REPRESENTATIVE PLANS TO BEGIN LIQUIDATION SALES ON 9/23/88.

LYNN WILDER, OSC
EPA REGION III
PHILADELPHIA, PA

AR100103

To: ERD/OERR (EPA5511)
 To: OPA/REG.III (EPA9315)
 To: REGION03.TAT (EPA9322)
 To: RRC (EPA9374)
 From: REGION03.TAT (EPA9322) Delivered: Fri 23-Sep-88 9:50 EDT S
 Subject: METRO POLREP 9
 Mail Id: IPM-163-880923-088540062

POLREP #9
 METRO CONTAINER CERCLA REMOVAL PROJECT
 TRAINER, DELAWARE COUNTY, PA
 ATTN: STEVE JARVELA AND TIM FIELDS
 CC: CHARLES KLEEMAN

- I. SITUATION (1900 HOURS, 9/22/88)
 A. ALL WORK CONTINUES PROGRESSING AS PLANNED.
 B. PERSONNEL ON SCENE: EPA-1, TAT-2, MINI-ERCS-7
 C. WEATHER: SUNNY AND WARM, TEMPERATURES IN THE LOW 80'S.
 D. ESTIMATED COSTS TO DATE (COB 9/22/88):

	EST COST TO DATE	CEILING
EPA	\$ 1,770	\$ 9,000
EPA INDIRECT	2,500	21,000
TAT	5,700	20,000
MINI-ERCS	30,000	135,000
	-----	-----
TOTAL	\$ 39,970	\$185,000

E. MAYOR OF TRAINER BOROUGH ON SITE TO OFFER ASSISTANCE WITH OBTAINING ELECTRICAL SERVICE AND TO DISCUSS MEETING BETWEEN LOCAL OFFICIALS AND THE OSC. LARGELY BECAUSE OF MAYOR COLE'S ASSISTANCE, THE ELECTRIC COMPANY PERFORMED WORK NECESSARY FOR COMMAND POST POWER.

II. ACTIONS TAKEN:

A. TRAILERS OWNED BY AMF TRUCKING (WESTFALL) BEGAN ARRIVING ON SITE AND UNLOADING DRUMS THIS DATE. OSC INQUIRED FROM WESTFALL WHY THIS WAS OCCURRING WHEN METRO ENTERPRISES WAS DECLARING BANKRUPTCY 9/23/88. WESTFALL INFORMED THE OSC THAT ALTHOUGH THE BANK (WILMINGTON TRUST) WILL FORECLOSE ON THE EQUIPMENT OWNED BY METRO, IT WILL NOT FORECLOSE ON THE PROPERTY. AMF TRUCKING PLANS TO CONTINUE USING PROPERTY AS A DRUM TRANSFER STATION AFTER THE BANKRUPTCY HEARING. THE OSC IS CONCERNED WITH BOTH SITE SECURITY AND THE POTENTIAL FOR WESTFALL TO DISPOSE OF POOR QUALITY DRUMS (OF NO RECLAIM VALUE) ON SITE. EPA OPERATIONS ARE CURRENTLY FIVE DAYS PER WEEK. IF WESTFALL IS LEGALLY ALLOWED TO CONTINUE OPERATIONS, THE OSC ANTICIPATES THE NECESSITY OF HAVING TAT ON SCENE OVER THE WEEKENDS TO MONITOR AND DOCUMENT SITE ACTIVITIES. THE OSC CONTACTED EPA/ORC (AJL), WHO WILL INVESTIGATE THE PROPRIETY OF THIS AFTER THE BANKRUPTCY HEARING. IF WESTFALL DOES NOT LEASE THE PROPERTY, HE SHOULD BE DENIED ACCESS.

B. MINI-ERCS PERSONNEL BEGAN STRECHING FENCING ON WEST END OF THE SITE THIS DATE. ALL POLES ON THIS SIDE OF THE PROPERTY HAVE BEEN INSTALLED.

C. TAT PERFORMED AIR MONITORING THROUGHOUT THE SITE. NO AMBIENT AIR READINGS ABOVE BACKGROUND WERE DETECTED.

D. TAT ARRANGED ANALYTICAL FOR ADDITIONAL SAMPLING EFFORTS TO CHARACTERIZE SITE. TAT ALSO DESIGNATED SAMPLING POINTS THIS DATE.

E. MEETING BETWEEN LOCAL TOWNSHIP OFFICIALS AND OSC
RESCHEDULED FOR 9/28/88, 0700 HOURS.

III. FUTURE PLANS

A. FENCING CONSTRUCTION TO CONTINUE ON EAST END OF PROPERTY.
MINI-ERCS TO BEGIN DRIVING POLES ON THE NORTHEAST END OF THE
PROPERTY.

B. TAT TO CONTINUE BERM DESIGN. THIS IS EXPECTED TO BE
COMPLETED 9/24/88.

C. TAT TO PERFORM ADDITIONAL SAMPLING, TO FURTHER
CHARACTERIZE SITE, TENTATIVELY SCHEDULED FOR 9/26/88.

D. MEETING BETWEEN OSC AND TRAINER BOROUGH OFFICIALS
TENTATIVELY SCHEDULED FOR 1930 HOURS, 9/28/88.

E. OSC TO CONTACT EPA/ORC (AJL) CONCERNING THE BANKRUPTCY
HEARING AND THE POSSIBLE LIQUIDATION SALES ON THE PROPERTY ON
9/23/88.

F. BECAUSE OF OTHER REGIONAL COMMITMENTS, OSC DISPOSE TO
OVERSEE OPERATIONS 9/23/88.

LYNN WILDER, OSC
EPA REGION III
PHILADELPHIA, PA

AR100105

Fo: EPA9322
From: EPA9322
Subject: METRO POLREP 10
Mail Id: IPM-163-880929-117850541

Delivered: Thu 29-Sep-88 13:05 EDT Sys 1

From: REGION03.TAT (EPA9322) Delivered: Tue 27-Sep-88 14:15 EDT
To: EPA9322
Subject: METRO POLREP 10
Mail Id: IPM-163-880927-128251279

POLREP #10
METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA AND TIM FIELDS
CC: CHARLES KLEEMAN

I. SITUATION (1900 HOURS, FRIDAY 9/23/88)

- A. ALL WORK CONTINUES PROGRESSING AS PLANNED.
- B. PERSONNEL ON SCENE: EPA-3, TAT-2, MINI-ERCS-7, PADER-1
- C. WEATHER: SUNNY AND WARM, TEMPERATURES IN THE LOW 80'S.
- D. ESTIMATED COSTS TO DATE (COB 9/23/88):

	EST COST TO DATE	CEILING
EPA	\$ 2,145	\$ 9,000
EPA INDIRECT	3,720	21,000
TAT	6,350	20,000
MINI-ERCS	20,740	135,000
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TOTAL	\$ 32,955	\$185,000

E. OSC CONTACTED BY DOJ (KASANO) AND ORC (FALKIN) AND INFORMED THAT AT 1100 HRS THIS DATE A BANKRUPTCY HEARING WAS CONDUCTED, AND THE COURT RULED THAT AS OF THIS DATE:

1. AMF WILL NOT CONDUCT ANY FURTHER BUSINESS AT THE METRO CONTAINER FACILITY AND MUST REMOVE ALL POSSESSIONS FROM THE FACILITY (SITE).

2. ALL PERSONS ENTERING UPON THE SITE SHALL COOPERATE WITH THE EPA'S OSC AND ANY LAWFUL INSTRUCTIONS GOVERNING THE SITE.

F. BRIAN BOYD, PA DER, ON SITE TO OBSERVE WORK ACTIVITIES.

II. ACTIONS TAKEN:

A. MINI-ERCS PERSONNEL CONTINUE TO INSTALL FENCING ON WEST END OF THE SITE, FENCING INSTALLATION COMPLETE UP TO STONY CREEK. ALL FENCE POSTS ON THIS SIDE OF THE PROPERTY HAVE BEEN INSTALLED.

B. TAT PERFORMED AIR MONITORING THROUGHOUT THE SITE. NO AMBIENT AIR READINGS ABOVE BACKGROUND WERE DETECTED.

III. FUTURE PLANS

A. FENCING CONSTRUCTION TO BE COMPLETED ON WEST END OF PROPERTY. MINI-ERCS TO BEGIN DRIVING POLES ON THE NORTHEAST END OF THE PROPERTY.

B. TAT TO CONTINUE BERM DESIGN. THIS IS EXPECTED TO BE COMPLETED 9/26/88.

C. TAT TO PERFORM ADDITIONAL SAMPLING, TO FURTHER CHARACTERIZE SITE, TENTATIVELY SCHEDULED FOR 9/26/88.

D. MEETING BETWEEN OSC AND TRAINER BOROUGH OFFICIALS TENTATIVELY SCHEDULED FOR 1930 HOURS, 9/28/88.

LYNN WILDER, OSC
EPA REGION III
PHILADELPHIA, PA

AR100106

To: ERD/OERR (EPA5511)
To: OPA/REG.III (EPA9315)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Wed 28-Sep-88 14:53 EDT
Subject: METRO POLREP 11
Mail Id: IPM-163-880928-134090583

PPOLREP #11
METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA AND TIM FIELDS
CC: CHARLES KLEEMAN

- I. SITUATION (1900 HOURS, MONDAY 9/26/88)
- A. ALL WORK CONTINUES PROGRESSING AS PLANNED.
 - B. PERSONNEL ON SCENE: EPA-1, TAT-3, MINI-ERCS-7.
 - C. WEATHER: SUNNY AND WARM, TEMPERATURES IN THE LOW 70'S.
 - D. ESTIMATED COSTS TO DATE (COB 9/26/88):

	EST COST TO DATE	CEILING
EPA	\$ 2,265	\$ 9,000
EPA INDIRECT	3,925	21,000
TAT	6,865	20,000
MINI-ERCS	23,330	135,000
-----		-----
TOTAL	\$ 36,385	\$185,000

II. ACTIONS TAKEN:

- A. MINI-ERCS PERSONNEL FINISHED INSTALLING FENCING ON WEST END OF THE SITE. FENCING INSTALLATION BEGINS ON EAST END OF PROPERTY.
- B. TAT PERFORMED AIR MONITORING THROUGHOUT THE SITE. NO AMBIENT AIR READINGS ABOVE BACKGROUND WERE DETECTED.
- C. AMF CONTINUES TO BRING TRUCKS ON SITE TO REMOVE EMPTY DRUMS FROM SITE. A GREAT DEAL OF ACTIVITY INVOLVING AMF TRUCKS OCCURRED THIS DATE, APPARENTLY ONLY REMOVING EMPTY DRUMS.
- D. TAT COMPLETED ADDITIONAL SAMPLING THIS DATE. FIVE DRUM SAMPLES, TWO LAGOON SAMPLES, ONE ASH AND ONE SOIL SAMPLE WERE TAKEN TO FURTHER DOCUMENT THE CONTAMINATION AT THE SITE.
- E. TAT COMPLETED BERM DESIGN THIS DATE FOR OSC REVIEW.

III. FUTURE PLANS

- A. FENCING CONSTRUCTION TO BE CONTINUED ON EAST END OF PROPERTY. MINI-ERCS TO CONTINUE DRIVING FENCE POSTS ON THE SOUTHEAST END OF THE PROPERTY.
- B. MEETING BETWEEN OSC AND TRAINER BOROUGH OFFICIALS TENTATIVELY SCHEDULED FOR 1930 HOURS, 9/28/88.
- C. TAT SAMPLING RESULTS DUE FROM WASTEX LABORATORY 10/10/88.
- D. BERM DESIGN TO BE REVIEWED AND EVALUATED BY OSC.

LYNN WILDER, OSC
EPA REGION III
PHILADELPHIA, PA

AR100107

To: ERD/OERR (EPA5511)
To: OPA/REG.III (EPA9315)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Wed 28-Sep-88 14:55 EDT
Subject: METRO POLREP 12
Mail Id: IPM-163-880928-134320219

POLREP #12
METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA AND TIM FIELDS
CC: CHARLES KLEEMAN

- I. SITUATION (1900 HOURS, TUESDAY 9/27/88)
A. ALL WORK CONTINUES PROGRESSING AS PLANNED.
B. PERSONNEL ON SCENE: TAT-3, MINI-ERCS-7.
C. WEATHER: SUNNY AND WARM, TEMPERATURES IN THE LOW 70'S.
D. ESTIMATED COSTS TO DATE (COB 9/27/88):

	EST COST TO DATE	CEILING
EPA	\$ 2,265	\$ 9,000
EPA INDIRECT	3,925	21,000
TAT	7,450	20,000
MINI-ERCS	28,200	135,000
	-----	-----
TOTAL	\$ 41,840	\$185,000

II. ACTIONS TAKEN:

- A. MINI-ERCS PERSONNEL BEGAN FENCING OPERATIONS ON EAST END OF PROPERTY. ALL POSTS WERE SET; MOST REQUIRED DRILLING THROUGH A ROCK LAYER BEFORE THEY COULD BE DRIVEN INTO THE GROUND.
- B. TAT PERFORMED AIR MONITORING THROUGHOUT THE SITE. NO AMBIENT AIR READINGS ABOVE BACKGROUND WERE DETECTED.
- C. AT 1000 HOURS THIS DATE, TAT NOTICED THAT AMF TRUCKS WERE AGAIN MOVING DRUMS ONTO THE SITE. TAT QUESTIONED AMF WORKERS AND WAS TOLD THAT THREE LOADS OF DRUMS WERE EXPECTED TO BE UNLOADED THIS DATE AT THE SITE. TAT INFORMED OSC FOX OF THIS DEVELOPMENT. OSC FOX CONTACTED DEPARTMENT OF JUSTICE (KASON), EPA/ORC (AJL), EPA/ENFORCEMENT (FALKIN) FOR ADVICE CONCERNING THIS MATTER. OSC FOX DECIDED TO ISSUE THE OWNER OF AMF DRUMS (WESTFALL) A COMPLIANCE ORDER STATING THAT HE WAS REQUIRED TO CEASE ALL DRUM OPERATION ON THE NORTHWEST END OF THE PROPERTY BY 9/30/88 AND THAT HE COULD USE THE NORTHEAST END OF THE PROPERTY FOR DRUM TRANSFER AS LONG AS THE OSC WAS KEPT INFORMED OF WHAT WAS BEING BROUGHT ON SITE AND WHAT WAS BEING REMOVED.
- D. LEAKAGE FROM INDUSTRIAL STEEL (ADJACENT TO METRO SITE) WAS DISCOVERED BY FENCING CREW THIS DATE. APPARENTLY, THIS LEAKAGE IS SEWER SLUDGE. TAT CONTACTED GENE CORBY, TRAINER BOROUGH HIGHWAY DEPARTMENT, WHO ALSO MANAGES THE BOROUGH'S SEWER LINES, AND WAS INFORMED THAT THE BOROUGH HAS NO SEWER LINES IN THAT AREA. IT WAS NOT APPARENT WHAT WAS THE SOURCE OF THE LEAKAGE, ONLY THAT IT RAN FROM THE INDUSTRIAL STEEL PROPERTY. OSC WILDER WAS INFORMED OF THIS DEVELOPMENT AT 1230 HOURS.
- E. A FIRE ON THE NORTHWEST END OF THE SITE WAS DISCOVERED AT 1300 HOURS. THE FIRE ORIGINATED IN A DRUM AND SPREAD TO THE BRUSH SURROUNDING IT. TRAINER FIRE COMPANY WAS NOTIFIED AND WHILE AWAITING THEIR ARRIVAL, AMF EMPLOYEES MANAGED TO EXTINGUISH THE

FIRE. IT WAS NOT APPARENT WHAT STARTED THE FIRE, ALTHOUGH AMF EMPLOYEES WERE WORKING IN AN AREA CLOSE TO THE FIRE. DUE TO THIS DEVELOPMENT, THE COMPLIANCE ORDER THAT OSC FOX HAD SIGNED WAS ALTERED TO INCLUDE PROHIBITION OF ANY BURNING ACTIVITIES ON ANY PART OF THE SITE.

F. TAT DELIVERED A COPY OF THE COMPLIANCE ORDER TO MR. WESTFALL THIS DATE AT 1600 HOURS. MR. WESTFALL READ THE ORDER AND EXPLAINED HE WOULD LIKE TO DISCUSS WITH AN OSC THE MEANING AND LIMITATIONS OF THIS ORDER. TAT INFORMED HIM THAT OSC JACKSON WILL BE ON SITE TOMORROW FOR THIS DISCUSSION.

G. TAT CONTACTED MAYOR COLE, TRAINER BOROUGH, TO CANCEL THE PROPOSED MEETING BETWEEN OSC AND LOCAL OFFICIALS. THE MEETING HAS BEEN POSTPONED UNTIL ANALYTICAL FROM TAT SAMPLING EFFORT (9/26/88) IS RECEIVED AND A BETTER CHARACTERIZATION OF THE THREATS POSED BY THE SITE IS AVAILABLE.

III. FUTURE PLANS

A. FENCING CONSTRUCTION TO BE CONTINUED ON EAST END OF PROPERTY. MINI-ERCS TO CEMENT POLES ON THE EAST END AS NEEDED AND BEGIN STRINGING FENCE.

B. TAT SAMPLING RESULTS DUE FROM WASTEX LABORATORY 10/10/88.

C. BERM DESIGN BY TAT TO BE REVIEWED AND EVALUATED BY OSC.

D. OSC JACKSON TO BE ONSITE 9/28/88 TO DISCUSS WITH MR. WESTFALL THE COMPLIANCE ORDER AND TO MONITOR ACTIVITIES.

E. OSC WILDER TO CONTACT INDUSTRIAL STEEL REGARDING THE LEAKAGE PROBLEM ONTO METRO PROPERTY.

LYNN WILDER, OSC
EPA REGION III
PHILADELPHIA, PA

AR100109

To: ERD/OERR (EPA5511)
To: OPA/REG.III (EPA9315)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Fri 30-Sep-88 14:04 EDT
Subject: METRO POLREP 13
Mail Id: IPM-163-880930-126630091

POLREP #13
METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA AND TIM FIELDS
CC: CHARLES KLEEMAN

- I. SITUATION (1900 HOURS, WEDNESDAY 9/28/88)
A. MINI-ERCS CONTINUE TO SECURE SITE ACCESS.
B. PERSONNEL ON SCENE: EPA-1, TAT-2, MINI-ERCS-7.
C. WEATHER: SUNNY AND WARM, TEMPERATURES IN THE HIGH 70'S.
D. ESTIMATED COSTS TO DATE (COB 9/28/88):

	EST COST TO DATE	CEILING
EPA	\$ 2,625	\$ 9,000
EPA INDIRECT	4,550	21,000
TAT	8,427	20,000
MINI-ERCS	30,574	135,000
	-----	-----
TOTAL	\$ 46,177	\$185,000

II. ACTIONS TAKEN:

A. MINI-ERCS PERSONNEL CONTINUED FENCING OPERATIONS ON NORTHEAST END OF PROPERTY. FENCING OPERATIONS ARE EXPECTED TO BE COMPLETED BY 9/29/88.

B. OSC JACKSON AND TAT DISCUSSED WITH METRO CONTAINER PRESIDENT MASLOW AND AMF TRUCKING OWNER WESTFALL THE TERMS OF THE COMPLIANCE ORDER DELIVERED ON 9/27/88. THIS COMPLIANCE ORDER PROHIBITS ALL BURNING ACTIVITIES ON SITE AS WELL AS LIMITING AMF OPERATIONS ON SITE. MASLOW AND WESTFALL REQUESTED PERMISSION TO USE TORCHES TO REMOVE EQUIPMENT FROM THE SITE. OSC JACKSON INFORMED THEM THAT AN OPERATIONAL PLAN FOR THIS REMOVAL PROCESS MUST BE PRESENTED TO EPA BEFORE BURNING WILL BE CONSIDERED TO BE ALLOWED ON SITE. THIS PLAN MUST FOLLOW ALL REQUIREMENTS UNDER THE EPA SITE SAFETY PLAN AND MUST COMPLY WITH EPA AND OSHA REGULATIONS. OSC JACKSON ALSO INFORMED MASLOW THAT HE MUST PROVIDE EPA WITH CERTIFIED DOCUMENTATION THAT THE INCINERATOR BUILDING IS IN STABLE CONDITION AND IS SAFE FOR PERSONNEL ENTRY BEFORE ANY EQUIPMENT CAN BE REMOVED FROM THAT BUILDING. EPA HAS ALREADY BEEN INFORMED THAT THE ROOF OF THIS BUILDING IS IN QUESTIONABLE CONDITION.

C. MASLOW AND WESTFALL INFORMED OSC JACKSON THAT THEY HAVE LEASED CRANES TO ARRIVE ON SITE 10/3/88 TO BE USED FOR REMOVING EQUIPMENT FROM THE INCINERATOR BUILDING.

D. ANOTHER DISCUSSION TOOK PLACE BETWEEN EPA, TAT, MASLOW, AND WESTFALL CONCERNING THE REMOVAL OF A HYDROCHLORIC ACID TANK CURRENTLY ON SITE. MASLOW AND WESTFALL PLAN TO TURN THIS TANK OVER TO A THIRD PARTY. OSC JACKSON RESPONDED THAT THIS MAY BE POSSIBLE, PROVIDED THAT THE PROPER MANIFESTS AND DOCUMENTATION CONCERNING USE AND DISPOSAL OF ANY WASTE ASSOCIATED WITH THE REMOVAL BE PREPARED AND REVIEWED BY EPA BEFORE THE TANK IS

ALLOWED TO BE TRANSPORTED FROM THE SITE.

E. OSC JACKSON DISCUSSED THE CONCERNS OF MASLOW AND WESTFALL WITH OSC FOX AND EPA/ORC AJL WHO CONFIRMED THAT ANY PLANS AFFECTING MATERIALS ON SITE MUST FIRST BE APPROVED BY EPA.

F. OSC JACKSON AND TAT MADE A SITE ENTRY TO ASSESS THE AREA IN WHICH THE BERM IS TO BE BUILT. SECTIONS OF THE SITE WHICH WOULD OBSTRUCT THE CONSTRUCTION OF THE BERM INCLUDE A DRUM STAGING AREA, A TANK TRUCK, AND A THICK SECTION OF WEEDS AND BRUSH.

G. WESTFALL AGREED TO PROVIDE THE REQUIRED DOCUMENTATION REGARDING HIS DRUM TRANSFER OPERATIONS, INVENTORING BOTH INCOMING AND OUTGOING RCRA EMPTY DRUMS. ALL DRUMS BELONGING TO AMF WILL BE REMOVED FROM PARCEL 336 (THE AREA OF CURRENT EPA ACTIVITIES) AND STORED ON PARCEL 331.

III. FUTURE PLANS

A. FENCING CONSTRUCTION TO BE CONTINUED ON EAST END OF PROPERTY.

B. MINI ERCS RESPONSE MANAGER WILL PREPARE A COST ESTIMATION FOR MATERIALS REQUIRED FOR BERM CONSTRUCTION.

C. BERM DESIGN BY TAT TO BE REVIEWED AND EVALUATED BY OSC.

D. PLANS WILL BE MADE WITH MINI-ERCS FOR THE REMOVAL OF THE DRUMS AND SECTION OF BRUSH CURRENTLY BLOCKING THE BERM CONSTRUCTION AREA.

E. EPA WILL CONTACT WESTFALL CONCERNING CONTENTS AND CONDITION OF TANK CAR IN THE BERM CONSTRUCTION AREA.

F. EPA/ORC TO BE AVAILABLE TO REVIEW PLANS FOR ACTIVITIES ON SITE BY MASLOW AND WESTFALL.

LYNN WILDER, OSC
EPA REGION III
PHILADELPHIA, PA

AR100111

To: ERD/OERR (EPA5511)
To: OPA/REG.III (EPA9315)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Fri 30-Sep-88 14:05 EDT
Subject: METRO POLREP 14
Mail Id: IPM-163-880930-126820500

POLREP #14

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA AND TIM FIELDS

CC: CHARLES KLEEMAN

I. SITUATION (1900 HOURS, THURSDAY 9/29/88)

- A. CHAIN LINK SECTION OF EAST SIDE FENCE COMPLETED.
- B. PERSONNEL ON SCENE: TAT-2, MINI-ERCS-7.
- C. WEATHER: OVERCAST AND CLOUDY, TEMPERATURES IN THE MID 60'S.
- D. ESTIMATED COSTS TO DATE (COB 9/28/88):

	EST COST TO DATE	CEILING
EPA	\$ 2,685	\$ 9,000
EPA INDIRECT	4,655	21,000
TAT	9,400	20,000
MINI-ERCS	33,650	135,000
	-----	-----
TOTAL	\$ 50,390	\$185,000

II. ACTIONS TAKEN:

A. MINI-ERCS PERSONNEL CONTIUED FENCING OPERATIONS ON NORTHEAST END OF PROPERTY. ALL FENCING IS COMPLETED EXCEPT FOR BARBED WIRE ACROSS FENCE TOPS.

B. MINI-ERCS PERSONNEL USED PLYWOOD TO BLOCKADE WINDOWS IN THE INCINERATOR BUILDING. THIS MEASURE IS INTENDED TO PREVENT UNAUTHORIZED ACCESS INTO THE BUILDING.

C. AT 1100 HOURS, TAT OBSERVED THREE NOBLE OIL TRUCKS, OF VINCETOWN, NJ, ON SITE IN THE HOT ZONE. TAT QUESTIONED THE DRIVER OF ONE OF THESE TRUCKS AS TO THE REASON FOR THEIR PRESENCE ON SITE. THE DRIVER REPLIED THAT NOBLE OIL COMPANY REGULARLY PUMPED MATERIALS OFF SITE FOR METRO CONTAINER. TAT INFORMED THE DRIVER THAT METRO CONTAINER HAD BECOME A CERCLA REMOVAL PROJECT AND ACCESS TO THE SITE HAD BEEN RESTRICTED BY EPA. THE DRIVER STATED THAT NOBLE OIL COMPANY WERE UNAWARE OF THIS SITUATION. THE TRUCKS THEN LEFT THE SITE.

D. AMF TRUCKS CONTINUED TO UNLOAD DRUMS IN THE DRUM STORAGE AREA AT THE NORTH END OF THE SITE. THIS IS THE ONLY AREA OF THE SITE WHICH DRUMS ARE PERMITTED TO BE LOADED AND UNLOADED BY AMF.

E. WESTFALL, OWNER OF AMF TRUCKING, SUBMITTED TO EPA THE FIRST INVENTORY OF DRUMS ON SITE FOR OSC REVIEW.

III. FUTURE PLANS

A. MINI-ERCS TO CONTINUE SECURING OF SITE.

B. EPA AND TAT TO REVIEW DRUM INVENTORY SUBMITTED BY WESTFALL.

C. MINI-ERCS TO BEGIN CLEARING OF BRUSH AND WEEDS IN THE AREA PROPOSED FOR BERM CONSTRUCTION.

D. OSC, TAT, AND MINI-ERCS TO REVIEW DESIGN REQUIREMENTS AND PLAN FOR BERM CONSTRUCTION.

LYNN WILDER, OSC
EPA REGION III
PHILADELPHIA, PA

AR100112

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: A.JACKSON (EPA9324)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Tue 4-Oct-88 9:25 EDT Sy
Subject: METRO CONTAINER POLREP #15
Mail Id: IPM-163-881004-084750837

POLREP #15
METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA AND TIM FIELDS
CC: CHARLES KLEEMAN

I. SITUATION (1900 HOURS, FRIDAY 9/30/88)

- A. CHAIN LINK FENCE WITH BARBED WIRE COMPLETED.
- B. PERSONNEL ON SCENE: EPA-1, TAT-2, MINI-ERCS-7.
- C. WEATHER: OVERCAST AND CLOUDY, TEMPERATURES IN THE MID 60'S.
- D. ESTIMATED COSTS TO DATE (COB 9/29/88):

	EST COST TO DATE	CEILING
EPA	\$ 2,685	\$ 9,000
EPA INDIRECT	4,654	21,000
TAT	9,412	20,000
MINI-ERCS	33,637	135,000

TOTAL	\$ 50,388	\$185,000

- E. OSC JACKSON ONSITE TO COORDINATE CONTRACTOR OPERATIONS.

II. ACTIONS TAKEN:

A. ERCS CREW BEGAN CUTTING BRUSH AWAY FROM THE PERIMETER OF THE SITE IN PREPARATION FOR CONSTRUCTION OF THE RETAINING WALL. DURING THIS OPERATION IT HAS BECOME NECESSARY TO MOVE SOME DRUMS IN ORDER TO CLEAR A PATH FOR THE CONSTRUCTION OF THE WALL, HOWEVER THE MOVEMENT OF DRUMS IS BEING KEPT TO A MINIMUM TO DECREASE THE PROBABILITY OF A SPILL. DRUMS THAT MUST BE MOVED ARE CHECKED FOR STRUCTURAL SOUNDNESS AND A NEUTRAL PH; THOSE THAT ARE NOT STRUCTURALLY SOUND OR ACIDIC OR BASIC ARE OVERPACKED AND THEN MOVED.

B. OSC JACKSON REQUESTED AMF PROPRIETOR WESTFALL TO PROVIDE EPA WITH AN INVENTORY LIST OF DRUMS BEING DELIVERED TO AND REMOVED FROM THE SITE.

C. METRO ENTERPRISES PROPRIETOR MASLOW REQUESTED PERMISSION TO HAVE EQUIPMENT REMOVED FROM INSIDE THE RECLAMATION PLANT. HE STATED THAT CUTTING TORCHES AND HEAVY EQUIPMENT, INCLUDING BUT NOT LIMITED TO, CRANES, WOULD BE USED. HE ALSO STATED THAT SOME OF METRO CONTAINER'S FORMER EMPLOYEES WERE TO ESTABLISH A COMPANY WHICH WOULD DO THE REMOVAL OF THE EQUIPMENT, HOWEVER THEY WOULD NOT BE ABLE TO AFFORD INSURANCE. THE OSC EXPLAINED THAT HE COULD NOT PERMIT ANY REMOVAL OF EQUIPMENT UNTIL THE ISSUES OF INSURANCE AS WELL AS SAFETY AND WORK PLAN ISSUES WERE RESOLVED. THE OSC TOLD MR. MASLOW THAT HE WOULD CONTACT EPA/ORC TO DISCUSS THE POSSIBILITIES OF EQUIPMENT REMOVAL AND THAT HE WOULD KEEP HIM INFORMED OF THE SITUATION. THE OSC ADVISED MR. MASLOW THAT NO WORK WOULD BE PERMITTED UNTIL THESE ISSUES WERE RESOLVED.

III. FUTURE PLANS

- A. MINI-ERCS TO CONTINUE PROVIDING SITE SECURITY.
- B. EPA AND TAT TO REVIEW DRUM INVENTORY SUBMITTED BY WESTFALL.
- C. OSC, TAT, AND MINI-ERCS TO REVIEW DESIGN REQUIREMENTS AND PLAN FOR RETAINING WALL CONSTRUCTION.
- D. MINI-ERCS TO CONTINUE BRUSH CUTTING AND MOVING DRUMS IN PREPARATION FOR THE RETAINING WALL CONSTRUCTION.
- E. OSC JACKSON TO CONTACT EPA/ORC (AJL) AND EPA/ENFORCEMENT (FALKIN) ON 10/3/88 TO DISCUSS MR. MASLOW'S REQUEST FOR PERMISSION TO REMOVE EQUIPMENT FROM THE PROCESS BUILDING.

LYNN WILDER, OSC
EPA REGION III
PHILADELPHIA, PA

100113

TO: ERD/CEKK (EPA9311)
To: OPA/REG.III (EPA9315)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)

From: REGION03.TAT (EPA9322) Delivered: Tue 4-Oct-88 17:05 EDT S
Subject: METRO CONTAINER POLREP #16
Mail Id: IPM-163-881004-153861262

POLREP #16
METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA AND TIM FIELDS
CC: CHARLES KLEEMAN

I. SITUATION (1700 HOURS, MONDAY 10/3/88)

- A. CHAIN LINK FENCE WITH BARBED WIRE COMPLETED.
- B. PERSONNEL ON SCENE: EPA-1, TAT-2, MINI-ERCS-7.
- C. WEATHER: PARTLY CLOUDY, SHORT PERIODS OF RAIN,

TEMPERATURES IN THE MID 60'S.

D. ESTIMATED COSTS TO DATE (COB 9/29/88):

	EST COST TO DATE	CEILING
EPA	\$ 5,122	\$ 9,000
EPA INDIRECT	2,955	21,000
TAT	10,950	20,000
MINI-ERCS	35,892	135,000
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TOTAL	\$ 54,919	\$ 185,000

E. OSC JACKSON ONSITE TO COORDINATE CONTRACTOR OPERATIONS.

II. ACTIONS TAKEN:

A. OSC JACKSON TELEPHONES EPA/ORC (AJL) TO DISCUSS THE WORK THAT THE PRP PLANS TO INITIATE IN THE BUILDING (REMOVAL OF EQUIPMENT). EPA/ORC (AJL) AND OPA/ENF (FALKIN) WILL CALL CENTRAL DRUMS' ATTORNEY (THE COMPANY IN CHARGE OF LIQUIDATION) AND MR. MAZLOW TO DISCUSS REMOVAL OF EQUIPMENT. THEY WILL RETURN A CALL AFTER LEARNING OF CENTRAL DRUM'S AND MR. MAZLOW'S POSITION ON THESE MATTERS.

C. OSC JACKSON CONTACTED OSC HESTON TO DISCUSS SITE ACTIVITIES. OSC HESTON SUGGESTED THE NEED TO SAMPLE WITHIN THE BUILDING TO DETERMINE POSSIBLE CONTAMINATION AS WELL AS POTENTIAL HAZARD TO WORKERS WITHIN THE BUILDING.

D. OSC JACKSON CONTACTED EPA/ENF (FALKIN) TO DISCUSS THE NEED FOR SAMPLING AND REQUIREMENTS FOR A WORK PLAN, SHOULD THE BUILDING BE DETERMINED SAFE FOR REMOVING EQUIPMENT. FALKIN AGREED WITH PROPOSED SAMPLING AND SUGGESTED ITEMS HE WOULD LIKE TO SEE BE INCORPORATED INTO THE WORK PLAN.

E. ERCS CONTINUES BRUSH CUTTING. DURING CUTTING OPERATION 110 DRUMS WERE DISPLACED, OF THE 110 DRUMS MOVED, THREE NECESSITATED OVER PACKING.

III. FUTURE PLANS

A. MINI-ERCS TO CONTINUE PROVIDING SITE SECURITY.

B. EPA AND TAT TO CONTINUE TO REVIEW DRUM INVENTORY SUBMITTED BY WESTFALL.

C. MINI-ERCS TO CONTINUE BRUSH CUTTING AND MOVING DRUMS IN PREPARATION FOR THE RETAINING WALL CONSTRUCTION.

D. TAT TO AMEND SITE SAFETY PLAN TO INCLUDE SAMPLING WITHIN THE BUILDING RECLAMATION PLANT, IN ADDITION TO DEVELOPING A SAMPLING PLAN.

E. ERCS CREW CONTINUES CUTTING BRUSH AWAY FROM THE PERIMETER OF THE SITE IN PREPARATION FOR CONSTRUCTION OF THE RETAINING WALL.

AR100114

ALAN JACKSON, OSC
EPA REGION III
PHILADELPHIA, PA

To: ERD/OERR (EPA5511)
To: OPA/REG.III (EPA9315)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Thu 6-Oct-88 10:25 EDT S
Subject: METRO CONTAINER POLREP #17
Mail Id: IFM-163-881006-093880602

POLREP #17
METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA AND TIM FIELDS
CC: CHARLES KLEEMAN

I. SITUATION (1600 HOURS, TUESDAY 10/4/88)

- A. BRUSH CUTTING ON SOUTHERN EDGE OF SITE COMPLETED.
- B. PERSONNEL ON SCENE: EPA-2, TAT-2, MINI-ERCS-8.
- C. WEATHER: PARTLY CLOUDY, CHANGING TO SUNNY IN P.M., TEMPERATURES IN THE MID 60'S.

D. ESTIMATED COSTS TO DATE (COB 10/3/88):

	EST COST TO DATE	CEILING
EPA	\$ 3,255	\$ 9,000
EPA INDIRECT	5,642	21,000
TAT	10,949	20,000
MINI-ERCS	38,299	135,000
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TOTAL	\$ 58,145	\$ 185,000

E. OSCS DISPOTO AND JACKSON ONSITE TO COORDINATE CONTRACTOR OPERATION

II. ACTIONS TAKEN:

A. MINI ERCS MOVED 110 DRUMS FROM SOUTH END OF SITE, 6 OF WHICH REQUIRED OVER PACKING, IN PREPARATION FOR CONSTRUCTION OF THE RETAINING WALL.

B. AMF (WESTFALL) SUBMITTED FIRST INVENTORY OF DRUM REMOVALS AND ADDITIONS TO SITE. HOWEVER, A SMALL MISCOMMUNICATION AS TO WHAT SHOULD BE INVENTORIED RESULTED IN AN INCOMPLETE INVENTORY LIST. A SECOND INVENTORY WAS SUBMITTED LATER IN THE DAY.

C. TWO REPRESENTATIVES FROM MOORGATE CO. (AN INVESTIGATION CO. FOR FINANCIAL INVESTMENTS) VISITED THE COMMAND POST TO INQUIRE ABOUT THE SITE AND SPECIFICALLY, THE CONDITIONS THAT EXIST WHICH PREVENT THE PLANT FROM BEING OPERATIONAL. OSC JACKSON DIRECTED REPS. TO EPA REGIONAL COUNCIL (FALKIN).

D. MR. LOU MASLOW (REP. OF METRO ENTERPRISES) VISITED COMMAND POST AT 1730 HOURS TO SPEAK WITH OSCS CONCERNING THE TIME FRAME IN WHICH HIS EMPLOYEES COULD ENTER THE RECLAMATION BUILDING TO DISASSEMBLE AND REMOVE EQUIPMENT TO BE SOLD DURING LIQUIDATION PROCEEDINGS. TAT ADVISED MR. MASLOW TO CONTACT OSC DISPOTO ON 10/5/88, SINCE BOTH OSCS HAD DEPARTED SITE FOR THE EVENING.

III. FUTURE PLANS

A. MINI-ERCS TO CONTINUE PROVIDING SITE SECURITY.

B. WESTFALL CONTINUES TO SUBMIT DRUM INVENTORY. EPA AND TAT CONTINUE TO REVIEW DRUM INVENTORY.

C. MINI-ERCS TO CONTINUE CLEARING DRUMS FROM THE SOUTH EDGE OF THE SITE IN PREPARATION FOR CONSTRUCTION OF RETAINING WALL. BACKHOE WILL BE MOBED ON SITE 10/5/88, TO ASSIST IN TRENCH DIGGING FOR RETAINING WALL.

D. TAT TO PERFORM AN ASSESSMENT OF THE RECLAMATION PLANT 10/6/88-10/7/88.

E. TAT TO PROVIDE AN AMENDMENT TO SAFETY PLAN WHICH IS TO INCLUDE THE ASSESSMENT OF BUILDINGS ON SITE.

F. OSC TO MEET WITH METRO ENTERPRISES REP. (MASLOW) CONCERNING FUTURE WORK ACTIVITIES WITHIN THE PLANT RECLAMATION BUILDING.

CHARLIE DISPOTO, OSC
EPA REGION III
PHILADELPHIA, PA

AR100115

To: ERD/OERR (EPA5511)
To: OPA/REG.III (EPA9315)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Fri 7-Oct-88 11:33 EDT S
Subject: METRO CONTAINER POLREP # 18
Mail Id: IPM-163-881007-104050616

POLREP #18
METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1400 HOURS, WEDNESDAY 10/5/88)

- A. SOUTHERN END OF SITE PREPARED (BRUSH CUTTING AND DRUM MOVING) FOR CONSTRUCTION OF RETAINING WALL.
- B. PERSONNEL ON SCENE: EPA-3, TAT-2, MINI-ERCS-9.
- C. WEATHER: SUNNY, TEMPERATURES IN THE MID 60'S.
- D. ESTIMATED COSTS TO DATE (COB 10/4/88):

	EST COST TO DATE	CEILING
EPA	\$ 3,870	\$ 9,000
EPA INDIRECT	6,710	21,000
TAT	12,728	20,000
MINI-ERCS	40,700	135,000
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TOTAL	\$ 64,008	\$ 185,000

E. OSC DISPOTO ONSITE TO COORDINATE CONTRACTOR OPERATIONS.

F. ~~SAF~~ JOAN HENRY ONSITE TO COORDINATE RCMS ACTIVITIES.

FA5

II. ACTIONS TAKEN:

- A. MINI ERCS MOVED 299 DRUMS AND TWO PIECES OF SCRAP EQUIPMENT FROM SOUTH END OF SITE IN PREPARATION FOR CONSTRUCTION OF THE RETAINING WALL. AREA CLEARING COMPLETED THIS DATE.
- B. MR. LOU MASLOW (REP. OF METRO ENTERPRISES) VISITED THE COMMAND POST TO SPEAK WITH OSC CONCERNING REMOVAL OF EQUIPMENT FROM DRUM RECLAMATION BUILDING (SEE SECTION II. D OF POLREP #17). MR. MASLOW WAS MADE AWARE THAT BUILDING ASSESSMENT MUST BE PERFORMED TO IDENTIFY ALL CHEMICAL AND PHYSICAL HAZARDS BEFORE ANY ENTRY BY HIS EMPLOYEES COULD BE MADE. HE WAS ALSO CONCERNED WITH THE TIME FRAME IN WHICH THE ASSESSMENT WOULD BE COMPLETED. THE OSC STATED THAT IT WOULD BE SEVERAL WEEKS BEFORE ANY ANALYTICAL RESULTS WOULD BE AVAILABLE AND HAVE BEEN REVIEWED. OSC AND ORC (FALKIN) MEET WITH MASLOW LATER THIS DATE (1400 HRS) TO AGAIN ADDRESS CONCERNS RAISED IN PREVIOUS DISCUSSION, AS WELL AS OTHER LEGAL ISSUES.
- C. OPA AND OSC MADE SITE ENTRY TO OBSERVE SITE WORK ACTIVITIES.
- D. A BACKHOE WAS MOBED ONSITE THIS DATE TO BE USED FOR CONSTRUCTION OF THE RETAINING WALL.
- E. AMENDMENT TO THE SITE SAFETY PLAN COMPLETED THIS DATE TO INCLUDE ENTRY INTO RECLAMATION BUILDING.

III. FUTURE PLANS

- A. MINI-ERCS TO CONTINUE PROVIDING SITE SECURITY.
- B. AMF TRUCKING (WESTFALL) CONTINUES TO SUBMIT DRUM INVENTORY. EPA AND TAT CONTINUE TO REVIEW DRUM INVENTORY.
- C. CONSTRUCTION OF RETAINING WALL TO BEGIN 10/6/88; CONSTRUCTION OF TRENCH FOR RETAINING WALL ALSO TO BEGIN ON THIS DATE. CLAY TO BE MOBED ONSITE FOR LINING OF TRENCH.
- D. TAT TO PERFORM SAMPLING IN THE RECLAMATION PLANT 10/7/88.
- E. ON-SITE ANALYTICAL RESULTS EXPECTED WEEK OF 10/10/88.

CHARLIE DISPOTO, OSC
EPA REGION III
PHILADELPHIA, PA

AR100116

To: ERD/OERR (EPA5511)
To: J.LUFFY (EPA9314)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Fri 7-Oct-88 17:31 EDT S
Subject: METRO CONTAINER POLREP No. 19
Mail Id: IFM-163-881007-157710045

POLREP #19
METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

- I. SITUATION (1700 HOURS, THURSDAY 10/6/88)
A. PERSONNEL ON SCENE: EPA-3, TAT-3, MINI-ERCS-9.
B. WEATHER: SUNNY, TEMPERATURES IN THE MID 60'S.
C. ESTIMATED COSTS TO DATE (COB 10/5/88):

	EST COST TO DATE	CEILING
EPA	\$ 4,200	\$ 9,000
EPA INDIRECT	7,280	21,000
TAT	13,840	20,000
MINI-ERCS	44,000	135,000
	-----	-----
TOTAL	\$ 69,320	\$ 185,000

- D. SAO JOAN HENRY ONSITE TO COORDINATE RCMS ACTIVITIES.
E. OSC DISPOTO ONSITE TO COORDINATE CONTRACTOR OPERATIONS.

II. ACTIONS TAKEN:

A. RETAINING WALL CONSTRUCTION BEGAN THIS DATE. CONSTRUCTION SLOW DUE TO BURIED DEMOLITION DEBRIS IN AREAS OF TRENCH EXCAVATION.

B. EPA AND TAT CONDUCTED A STRUCTURAL INTEGRITY ASSESSMENT AS WELL AS AN AMBIENT AIR SURVEY IN THE RECLAMATION BUILDING. AIR QUALITY CONDITIONS ABOVE AMBIENT BACKGROUND WERE NOT ENCOUNTERED. OSC AND TAT OBSERVED SEVERAL OPEN DRAINAGE SYSTEMS IN PLANT FLOORING WHICH CONTAINED UNKNOWN MATERIAL. THERE WAS ALSO OBVIOUS ACCUMULATION OF SOLID MATERIAL THROUGHOUT THE BUILDING WHICH WILL NEED TO BE SAMPLED TO FURTHER IDENTIFY ANY POSSIBLE HEALTH THREATS.

C. METRO ENTERPRISES (MAZLOW) SUBMITTED TO THE OSC A PROPOSED WORK PLAN FOR THE REMOVAL OF RECLAMATION PLANT EQUIPMENT.

D. ONE TRUCK LOAD OF SELECT BACKFILL (SANDY CLAY) MATERIAL DELIVERED THIS DATE TO BE USED IN THE RETAINING WALL TRENCH.

III. FUTURE PLANS

A. MINI-ERCS TO CONTINUE PROVIDING SITE SECURITY.

B. AMF TRUCKING (WESTFALL) CONTINUES TO SUBMIT DRUM INVENTORY. EPA AND TAT CONTINUE REVIEWING DRUM INVENTORY.

C. TAT TO SAMPLE MATERIALS ENCOUNTERED IN RECLAMATION BUILDING TO FURTHER CHARACTERIZE HAZARDS ASSOCIATED WITH EQUIPMENT REMOVAL.

D. TAT TO AMEND SAMPLING PLAN TO INCLUDE SAMPLING IN THE RECLAMATION BUILDING.

E. ERCS TO PROCURE A LABORATORY FOR THE ANALYSIS OF SAMPLES TO BE TAKEN IN THE RECLAMATION BUILDING.

F. ANALYTICAL RESULTS OF SAMPLES TAKEN 9/26/88 EXPECTED WEEK OF 10/10/88.

CHARLIE DISPOTO, OSC
EPA REGION III
PHILADELPHIA, PA

AR100117

To: ERD/OERR (EPA5511)
To: J.LUFFY (EPA9314)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Tue 11-Oct-88 11:22 EDT
Subject: METRO CONTAINER POLREP # 20
Mail Id: IPM-163-881011-102370384

POLREP #20

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1700 HOURS, FRIDAY 10/7/88)

- A. PERSONNEL ON SCENE: EPA-3, TAT-1, MINI-ERCS-9.**
- B. WEATHER: PARTLY SUNNY, TEMPERATURES IN THE UPPER 50'S.**
- C. ESTIMATED COSTS TO DATE (COB 10/6/88):**

	EST COST TO DATE	CEILING
EPA	\$ 4,305	\$ 9,000
EPA INDIRECT	7,462	21,000
TAT	13,109	20,000
MINI-ERCS	47,497	135,000
	-----	-----
TOTAL	\$ 72,373	\$ 185,000

D. SAO JOAN HENRY ONSITE TO COORDINATE RCMS ACTIVITIES.

E. OSC FOX ONSITE TO PROVIDE ASSISTANCE WITH SITE OPERATIONS AND ISSUES.

II. ACTIONS TAKEN:

A. RETAINING WALL CONSTRUCTION CONTINUES, 56 FEET OF WALL INSTALLED THIS DATE. CONSTRUCTION SLOW DUE TO BURIED DEMOLITION DEBRIS IN AREAS OF TRENCH EXCAVATION.

B. OSC'S FOX AND DISPOTO MAKE SITE ENTRY TO OBSERVE OPERATIONS. UPON INVESTIGATION, THE OSC'S NOTICED SEVERAL TANKS BENEATH DRAINAGE GRATING IN THE RECLAMATION BUILDING. OSC TASKED TAT TO OBTAIN SAMPLES OF THIS MATERIAL FOR ANALYSIS.

C. SAMPLING PLAN AMENDED TO INCLUDE SAMPLING IN THE RECLAMATION BUILDING.

D. OSC TASKED MINI-ERCS TO OBTAIN BIDS FOR LABORATORY SERVICES.

TWO BIDS RECEIVED THIS DATE.

III. FUTURE PLANS

A. RETAINING WALL CONSTRUCTION TO CONTINUE.

B. AMF TRUCKING (WESTFALL) TO CONTINUE TO SUBMIT DRUM INVENTORY. EPA AND TAT TO CONTINUE REVIEWING DRUM INVENTORY.

C. MINI-ERCS TO CONTINUE PROVIDING SITE SECURITY.

D. TAT TO SAMPLE MATERIALS ENCOUNTERED IN RECLAMATION BUILDING TO FURTHER CHARACTERIZE HAZARDS ASSOCIATED WITH EQUIPMENT REMOVAL. SAMPLING SCHEDULED FOR 10/10/88.

E. ANALYTICAL RESULTS OF SAMPLES TAKEN 9/26/88 EXPECTED WEEK OF 10/10/88.

F. OSC TO CONTACT TRAINER BOROUGH FIRE AND BUILDING INSPECTORS TO REQUEST INSPECTIONS BE CONDUCTED IN RECLAMATION BUILDING. THIS IS IN ANTICIPATION OF METRO REPRESENTATIVES ENTERING FACILITY TO DISMANTLE AND REMOVE EQUIPMENT FOR LIQUIDATION SALE.

CHARLIE DISPOTO, OSC
EPA REGION III
PHILADELPHIA, PA

AR100118

To: ERD/OERR (EPA5511)
To: J.LUFFY (EPA9314)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: C.DISPOTO (EPA9343) Delivered: Wed 12-Oct-88 8:24 EDT Sys
Subject: METRO CONTAINER CERCLA REMOVAL PROJECT POLREP 21
Mail Id: IPM-163-881012-075630314

POLREP #21

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1900 HOURS, MONDAY 10/10/88)

A. TO DATE, APPROXIMATELY 60% OF RETAINING WALL HAS BEEN INSTALLED. ESTIMATED TIME OF COMPLETION IS COB 10/12/88 OR MID-DAY 10/13/88. ALL PERSONNEL AND EQUIPMENT TO BE DEMOBILIZED UNTIL ANALYTICAL RESULTS OF THE ON-SITE AND RECLAMATION BUILDING SAMPLES HAVE BEEN RECEIVED AND REVIEWED. AT THAT TIME, THE OSC WILL DETERMINE WHETHER FURTHER REMOVAL ACTIONS ARE NECESSARY. 24 HOUR SECURITY SERVICES WILL BE MAINTAINED DURING THIS INTERIM PERIOD.

B. PERSONNEL ON SCENE: EPA-1, TAT-2, MINI-ERCS-5.

C. WEATHER: SUNNY AND WINDY, TEMPERATURES IN THE UPPER 50'S.

D. ESTIMATED COSTS TO DATE (COB 10/7/88):

	EST COST TO DATE	CEILING
EPA	\$ 4,740	\$ 9,000
EPA INDIRECT	8,216	21,000
TAT	14,218	20,000
MINI-ERCS	49,296	135,000
	-----	-----
TOTAL	\$ 76,470	\$ 185,000

II. ACTIONS TAKEN:

A. OSC/TAT INSPECT RECLAMATION BUILDING TO LOCATE POSSIBLE SAMPLE LOCATIONS.

B. TAT PERFORMED SAMPLING IN THE DRUM RECLAMATION BUILDING THIS DATE. SAMPLING AREAS INCLUDED: THE OPEN DRAINAGE SYSTEM IN THE FLOOR, SUB-FLOOR TANKS, DEBRIS/DUST THROUGHOUT THE BUILDING, AND SCRAPE SAMPLES OF THE EQUIPMENT. 6 SAMPLES OBTAINED: 3 LIQUID, 2 SOIL/DUST AND 1 SCRAPING OF PROCESS EQUIPMENT.

C. RETAINING WALL CONSTRUCTION CONTINUES. 152 FEET OF WALL INSTALLED TO DATE. CONSTRUCTION SLOW DUE TO BURIED DEMOLITION DEBRIS IN AREAS OF TRENCH EXCAVATION.

D. ONE LOAD OF SELECT BACKFILL MATERIAL DELIVERED THIS DATE TO BE USED IN RETAINING WALL TRENCH.

E. DUE TO THE FEDERAL HOLIDAY, SAMPLE ANALYSIS RESULTS WERE UNAVAILABLE THIS DATE.

III. FUTURE PLANS

A. RETAINING WALL CONSTRUCTION TO CONTINUE.

B. MINI-ERCS TO CONTINUE PROVIDING SITE SECURITY.

C. TAT TO DELIVER SAMPLES TO LABORATORY CONTRACTED TO PERFORM ANALYSIS.

D. AMF TRUCKING (WESTFALL) TO CONTINUE TO SUBMIT DRUM INVENTORY. EPA AND TAT TO CONTINUE REVIEWING DRUM INVENTORY.

E. ANALYTICAL RESULTS OF SAMPLES TAKEN 9/26/88 EXPECTED WEEK OF 10/11/88.

F. OSC TO CONTACT TRAINER BOROUGH FIRE AND BUILDING INSPECTORS TO REQUEST INSPECTIONS BE CONDUCTED IN RECLAMATION BUILDING. THIS IS IN ANTICIPATION OF METRO REPRESENTATIVES ENTERING FACILITY TO DISMANTLE AND REMOVE EQUIPMENT FOR LIQUIDATION SALE.

CHARLIE DISPOTO, OSC
EPA REGION III
PHILADELPHIA, PA

AR100119

To: ERD/OERR (EPA5511)
To: J.LUFFY (EPA9314)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Wed 12-Oct-88 17:41 EDT
Subject: METRO CONTAINER POLREP No. 22
Mail Id: IFM-163-881012-159160375

POLREP #22
METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS
I. SITUATION (1700 HOURS, TUESDAY 10/11/88)

A. ESTIMATED TIME OF COMPLETION IS COB 10/12/88.
ALL PERSONNEL AND EQUIPMENT TO BE DEMOBILIZED UNTIL ANALYTICAL RESULTS OF THE ON-SITE AND RECLAMATION BUILDING SAMPLES HAVE BEEN RECEIVED AND REVIEWED. AT THAT TIME, THE OSC WILL DETERMINE WHETHER FURTHER REMOVAL ACTIONS ARE NECESSARY. 24 HOUR SECURITY SERVICES WILL BE MAINTAINED DURING THIS INTERIM PERIOD.
B. PERSONNEL ON SCENE: EPA-1, TAT-1, MINI-ERCS-5.
C. WEATHER: PARTLY CLOUDY AND WINDY, TEMPERATURES IN THE UPPER 50'S.
D. ESTIMATED COSTS TO DATE (COB 10/10/88):

	EST COST TO DATE	CEILING
EPA	\$ 5,100	\$ 9,000
EPA INDIRECT	8,840	21,000
TAT	15,047	20,000
MINI-ERCS	51,143	135,000
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TOTAL	\$ 80,130	\$ 185,000

E. PA DER (BOYD) ONSITE TO INQUIRE ABOUT SITE ACTIVITIES AND FUTURE PLANS. OSC INVITED PA DER TO PARTICIPATE IN INSPECTION OF 10/12/88 (SEE II B BELOW).

II. ACTIONS TAKEN:

A. CONSTRUCTION OF RETAINING WALL CONTINUES, 80 FEET INSTALLED THIS DATE. 232 FEET OF RETAINING WALL INSTALLED TO DATE. THE OSC WAS NOTIFIED THAT SOIL SATURATED WITH WHAT APPEARED TO BE SITE LIQUIDS WAS ENCOUNTERED WHILE EXCAVATING THE TRENCH.
B. OSC CONTACTED TRAINER BOROUGH TO REQUEST BUILDING AND FIRE INSPECTIONS BE CONDUCTED IN THE RECLAMATION BUILDING. OSC WAS NOTIFIED THAT THE BUILDING AND FIRE INSPECTORS WILL BE ONSITE 10/12/88 TO INSPECT THE RECLAMATION BUILDING. OSC INFORMED METRO REP (MAZLOW) OF THE INSPECTION. METRO WILL BE REPRESENTED DURING THE INSPECTION.
C. ONE LOAD OF SELECT BACKFILL MATERIAL DELIVERED THIS DATE (THREE LOADS TOTAL) TO BE USED IN RETAINING WALL TRENCH.
D. SAMPLE RESULTS OF 9/26/88 RECEIVED 1630 HRS. ANALYSIS IS BEING REVIEWED FOR QUALITY ASSURANCE.
E. TAT DELIVERED SAMPLES OF 10/10/88 TO THE LAB FOR ANALYSIS.
F. OSC TASKED MINI-ERCS TO PROVIDE COMMAND POST FOR SECURITY DURING TEMPORARY MOBILIZATION PERIOD. 24 HOUR SECURITY TO BEGIN TENTATIVELY ON 10/13/88.

G. OSC MET WITH METRO REP MAZLOW TO UPDATE HIM ON SITE ACTIVITIES. THE OSC REQUESTED A MORE DETAILED WORKPLAN FOR THE WORK PROPOSED IN THE RECLAMATION BUILDING. SPECIFIC ITEMS TO BE ADDRESSED INCLUDE WHAT PIECES OF EQUIPMENT ARE TO BE DISMANTLED, HOW THESE TASKS WILL BE ACCOMPLISHED AND WHICH WALLS, IF ANY, MAY NEED TO BE TAKEN DOWN TO REMOVE EQUIPMENT FROM BUILDING.

III. FUTURE PLANS

A. RETAINING WALL CONSTRUCTION TO CONTINUE. ANTICIPATED COMPLETION OF CONSTRUCTION 10/12/88.
B. MINI-ERCS TO CONTINUE PROVIDING SITE SECURITY.
C. AMF TRUCKING (WESTFALL) TO CONTINUE TO SUBMIT DRUM INVENTORY. EPA AND TAT TO CONTINUE REVIEWING DRUM INVENTORY.
D. ANALYTICAL RESULTS OF SAMPLES TAKEN 10/10/88/88 EXPECTED WEEK OF 10/17/88.
E. TRAINER BOROUGH FIRE AND BUILDING INSPECTORS TO BE ON SITE 10/12/88 TO CONDUCT INSPECTIONS.
F. TEMPORARY DEMOBILIZATION TENTATIVELY SCHEDULED TO BEGIN 10/13/88.

CHARLIE DISPOTO, OSC
EPA REGION III
PHILADELPHIA, PA

AR100120

To: ERD/OERR (EPA5511)
To: J.LUFFY (EPA9314)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Mon 17-Oct-88 14:06 EDT
Subject: METRO POLREP 23
Mail Id: IPM-163-881017-127040669

POLREP #23

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1700 HOURS, WEDNESDAY 10/12/88)

A. ALL PERSONNEL AND EQUIPMENT DEMOBILIZED UNTIL ANALYTICAL RESULTS OF THE ON-SITE AND RECLAMATION BUILDING SAMPLES HAVE BEEN RECEIVED AND REVIEWED. AT THAT TIME, THE OSC WILL DETERMINE WHETHER FURTHER REMOVAL ACTIONS ARE NECESSARY. 24 HOUR SECURITY SERVICES WILL BE MAINTAINED DURING THIS INTERIM PERIOD.

B. PERSONNEL ON SCENE: EPA-2, TAT-1, MINI-ERCS-5.

C WEATHER: PARTLY CLOUDY AND WINDY, TEMPERATURES IN THE UPPER 50'S.

D. ESTIMATED COSTS TO DATE (COB 10/11/88):

	EST COST TO DATE	CEILING
EPA	\$ 5,655	\$ 9,000
EPA INDIRECT	9,985	21,000
TAT	16,067	20,000
MINI-ERCS	55,550	135,000
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TOTAL	\$ 87,257	\$ 185,000

E. OSC'S FOX AND DISPOTO ONSITE TO COORDINATE CONTRACTOR OPERATIONS/ SITE ISSUES.

II. ACTIONS TAKEN:

A. CONSTRUCTION OF THE RETAINING WALL COMPLETED, 280 FEET TOTAL INSTALLED.

B. TRAINER BOROUGH BUILDING AND FIRE INSPECTORS (BECK AND CAPASSO) ON SITE TO CONDUCT INSPECTIONS IN THE RECLAMATION BUILDING. METRO REP (JACK WARNER) ACCOMPANIED SITE ENTRY TEAM DURING THE INSPECTION. A MEMO WAS SUBMITTED TO THE OSC BY THE FIRE CHIEF STATING REQUIREMENTS TO BE FULFILLED BEFORE METRO BEGINS ANY ACTIVITY IN THE BUILDING.

C. TAT BEGAN QA/QC ON ANALYSIS OF SAMPLES FROM 9/26/88 SAMPLING EFFORT.

D. METRO REPRESENTATIVE MASLOW SUBMITTED TO OSC FOR REVIEW AN ADDENDUM TO PROPOSED WORKPLAN FOR RECLAMATION BUILDING. A COPY OF THIS WORKPLAN WAS FAXED TO ORC (FALKIN).

III. FUTURE PLANS

A. MINI-ERCS TO BEGIN TO PROVIDE 24 HOUR SITE SECURITY, 10/13/88.

B. AMF TRUCKING (WESTFALL) TO CONTINUE TO SUBMIT DRUM INVENTORY TO SITE SECURITY.

C. ANALYTICAL RESULTS OF SAMPLES TAKEN 10/10/88 EXPECTED WEEK OF 10/17/88. AT THAT TIME, THE OSC WILL DECIDE WHETHER FURTHER REMOVAL ACTIONS ARE NECESSARY.

D. MINI-ERCS TO DEMOBILIZE ALL EQUIPMENT BY COB 10/14/88.

CHARLIE DISPOTO, OSC
EPA REGION III
PHILADELPHIA, PA

AR100121

POLREP #24

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1700 HOURS, FRIDAY 10/21/88)

A. ALL PERSONNEL AND EQUIPMENT DEMOBILIZED UNTIL ANALYTICAL RESULTS OF THE ON-SITE AND RECLAMATION BUILDING SAMPLES HAVE BEEN RECEIVED AND REVIEWED. AT THAT TIME, THE OSC WILL DETERMINE WHETHER FURTHER REMOVAL ACTIONS ARE NECESSARY. 24 HOUR SECURITY SERVICES WILL BE MAINTAINED DURING THIS INTERIM PERIOD.

B. PERSONNEL ON SCENE: MINI-ERCS-1.

C. ESTIMATED COSTS TO DATE (COB 10/21/88):

	EST COST TO DATE	CEILING
EPA	\$ 6,500	\$ 9,000
EPA INDIRECT	10,500	21,000
TAT	19,000	20,000
MINI-ERCS	60,000	135,000

TOTAL	\$ 96,000	\$ 185,000

II. ACTIONS TAKEN:

A. ERCS CONTINUES TO PROVIDE 24 HOUR GUARD SERVICE TO CONTROL ACCESS TO PROPERTY.

B. AMF (WESTFALL) CONTINUES TO PROVIDE OSC WITH INVENTORY OF RCRA EMPTY DRUMS MOVING ON AND OFF SITE.

C. ANALYTICAL RESULTS FROM 9/26/88 SAMPLING EFFORT WERE RECEIVED 10/14/88. EVALUATION OF THAT DATA REVEALED LOW LEVEL ORGANIC AND METAL CONTAMINATION IN THE OIL SLUDGE AND SOIL ON SITE. THESE LEVELS DO NOT APPEAR TO PRESENT AN IMMINENT THREAT UNLESS SPILLAGE INTO STONEY CREEK WERE TO OCCUR. CONSTRUCTION OF THE RETAINING WALL AIDS IN THE PREVENTION OF SUCH AN EVENT.

D. A MEETING BETWEEN OSC FOX, OSC DISPOTO, EPA/ENFORCEMENT FALKIN AND TAT WAS HELD 10/18/88 TO DISCUSS ANALYTICAL RESULTS RECEIVED 10/14/88. A DECISION ON CONTINUATION OF EMERGENCY RESPONSE ACTIVITIES WAS DELAYED UNTIL FURTHER ANALYTICAL FROM 10/10/88 SAMPLING EFFORT IS RECEIVED.

E. PARTIAL ANALYTICAL FROM THE 10/10/88 SAMPLING EFFORT WAS RECEIVED 10/20/88. PRELIMINARY REVIEW OF THE RESULTS INDICATED SIMILIAR CHEMICAL SPECIES AND LEVELS OF CONTAMINATION AS PREVIOUS SAMPLING EFFORTS.

F. OSC DISPOTO CONTACTED BY METRO ENTERPRISES (MASLOW) FOR INFORMATION CONCERNING EQUIPMENT REMOVAL FROM THE RECLAMATION BUILDING. OSC INFORMS MASLOW THAT NO DECISION HAS BEEN REACHED ON THIS MATTER AND THAT HE WILL BE CONTACTED WHEN THAT DECISION HAS BEEN MADE.

III. FUTURE PLANS

A. TAT TO CONTINUE REVEIW AND QA/QC OF METRO ANALYTICAL RESULTS. ALL ANALYTICAL DATA EXPECTED 10/24/88.

B. TAT TO OBTAIN A GC FINGERPRINT OF VARIOUS OIL COMPOUNDS FOR COMPARISON WITH ANALYTICAL RESULTS.

C. ERCS TO CONTINUE TO PROVIDE 24 HOUR SECURTIY UNTIL DECISION ON CLEANUP ACTIVITIES IS MADE.

CHARLIE DISPOTO, OSC
EPA REGION III
PHILADELPHIA, PA

AR100122

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: D.FOX (EPA9344)
To: RRC (EPA9374)
From: C.DISPOTO (EPA9343) Delivered: Wed 2-Nov-88 10:48 EST Sys
Subject: METRO CONTAINER POLREP #25
Mail Id: IPM-163-881102-097270032

POLREP #25

METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1700 HOURS, THURSDAY 10/27/88)

A. COMPLETE ANALYTICAL RESULTS FROM ON-SITE AND RECLAMATION
BUILDING SAMPLES HAVE BEEN RECEIVED AND QA/QC'D.

B. AFTER EXTENSIVE REVIEW OF THE ANALYTICAL RESULTS, THE OSC
HAS DETERMINED THAT THE ACTIONS PERFORMED TO DATE BY THE EPA
REMOVAL RESPONSE SECTION HAVE ELIMINATED THE IMMINENT THREAT TO
PUBLIC HEALTH AND TO THE ENVIRONMENT.

C. ESTIMATED COSTS TO DATE (COB 10/27/88):

	EST COST TO DATE	CEILING
EPA	\$ 6,500	\$ 9,000
EPA INDIRECT	10,500	21,000
TAT	19,000	20,000
MINI-ERCS	60,000	135,000
	-----	-----
TOTAL	\$ 96,000	\$ 185,000

II. ACTIONS TAKEN:

A. AS A RESULT OF EPA REMOVAL RESPONSE SECTION ACTIVITIES
PERFORMED AT THE SITE, A REMOVAL SITUATION IS NO LONGER
WARRANTED. CONSEQUENTLY, ALL FUTURE ACTIVITIES PERFORMED
CONCERNING THE SITE WILL BE UNDER THE DIRECTION OF THE
EPA/ENFORCEMENT SECTION.

B. A LETTER ADDRESSED TO METRO ENTERPRISES PROPRIETOR MR.
MASLOW WAS SENT BY LARRY FALKIN EPA/ENFORCEMENT OUTLINING A
REVISED WORK PLAN.

C. EPA REMOVAL RESPONSE SECTION WILL PERIODICALLY MAKE
VISITS TO THE SITE TO INSURE THE INTEGRITY OF THE RETAINING WALL
AND TO INVESTIGATE ANY POSSIBILITY OF FURTHER OFF-SITE
MIGRATION OF HAZARDOUS MATERIALS.

D. OSC HAS REFERRED THE METRO CONTAINER SITE TO EPA SITE
INVESTIGATION FOR POSSIBLE RANKING ON THE NPL.

III. FUTURE PLANS

A. COMMAND POST AND 24-HOUR SECURITY GUARD TO BE DEMOBILIZED
BY NOON ON TUESDAY 11/1/88.

B. OSC TO CONTACT MAYOR COLE OF TRAINER TO INFORM HIM OF
SITE CONDITIONS AND DECISIONS MADE BY EPA.

C. OSC REPORT TO BE DRAFTED AND SUBMITTED AS PER NCP
GUIDELINES.

CHARLIE DISPOTO, OSC
EPA REGION III
PHILADELPHIA, PA

AR100123

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: D.FOX (EPA9344)
To: RRC (EPA9374)
From: D.FOX (EPA9344) Delivered: Thu 10-Nov-88 10:29 EST Sys 1
Subject: METRO PR 26
Mail Id: IPM-163-881110-094350417

POLREP #26

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1700 HOURS, TUESDAY 11/8/88)

A. EMERGENCY RESPONSE/REMOVAL ACTIVITIES HAS BEEN SUSPENDED DUE TO ELIMINATION OF IMMINENT THREAT AT THE SITE BY ACTIONS TAKEN. THE SITE REMAINS UNDER THE DIRECTION OF EPA/ENFORCEMENT SECTION.

B. PERSONNEL ON SCENE: TAT-1, MINI-ERCS-5.

C. ESTIMATED COSTS TO DATE (COB 11/8/88):

	EST COST TO DATE	CEILING
EPA	\$ 6,500	\$ 9,000
EPA INDIRECT	10,500	21,000
TAT	20,000	20,000
MINI-ERCS	65,000	135,000
	-----	-----
TOTAL	\$102,000	\$ 185,000

II. ACTIONS TAKEN:

A. COMMAND POST AND 24 HOUR SECURITY GUARD DEMOBILIZED 11/1/88.

B. OSC SENT A LETTER 11/3/88 TO MAYOR COLE OF TRAINER EXPLAINING ACTIONS TAKEN TO DATE AT THE SITE AND ELIMINATION OF IMMINENT THREAT.

C. EPA/ENFORCEMENT FALKIN ONSITE WEEK OF 10/31/88 AND INFORMED OSC OF PUDDLING OF RAINWATER ALONG THE RETAINING WALL AT THE NORTHWEST CORNER OF THE LAGGON.

D. OSC DIRECTED TAT AND MINI-ERCS TO INVESTIGATE THE POTENTIAL PROBLEM OF SOIL EROSION BY RAINWATER AT THE RETAINING WALL.

E. TAT AND MINI-ERCS ONSITE 11/8/88 TO CORRECT EROSION PROBLEM FROM RAINWATER AT THE RETAINING WALL. RAINWATER HAD COLLECTED AT LOW POINTS ALONG THE RETAINING WALL AND AS TOPSOIL BEGAN TO COMPACT, SEEPAGE OF THE RAINWATER THROUGH THE SOIL AND UNDER THE WALL OCCURRED. A TRENCH, 1 FOOT DEEP AND 200 FEET LONG WAS DUG AT THE RETAINING WALL, FILLED WITH CLAY, AND MANUALLY COMPACTED TO ELIMINATE THIS PROBLEM. THE CLAY WILL RETARD THE SEEPAGE OF RAINWATER UNDER THE WALL.

III. FUTURE PLANS

A. EPA/WESTERN RESPONSE AND OIL ENFORCEMENT TO CONTINUE PERIODIC VISITS TO THE SITE TO ENSURE THE INTEGRITY OF THE RETAINING WALL.

B. OSC REPORT TO BE DRAFTED AND SUBMITTED AS PER NCP GUIDELINES.

CHARLIE DISPOTO, OSC
EPA REGION III
PHILADELPHIA, PA

AR100124

To: ERD/OERR (EPA5511)
 To: J.LUFFY (EPA9314)
 To: REGION03.TAT (EPA9322)
 To: S.JARVELA (EPA9341)
 To: RRC (EPA9374)
 From: REGION03.TAT (EPA9322) Delivered: Sat 3-Dec-88 19:19 EST S
 Subject: METRO CONTAINER SITE POLREP #27
 Mail Id: IPM-163-881203-173880744

POLREP 27

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1700 HOURS, WEDNESDAY 11/23/88)

A.11/21/88 - TAT INSPECTS RETAINING WALL TO EVALUATE ITS PERFORMANCE AND TO ASSURE SITE SECURITY. DURING THE WEEKEND, 11/19-20/88, THE AREA RECEIVED UNSEASONABLE AMOUNTS OF RAIN WHICH CAUSED A LARGE QUANTITY OF SITE LIQUID TO ACCUMULATE AT THE RETAINING WALL. THE WALL FUNCTIONED PROPERLY; HOWEVER SEEPAGE THROUGH THE SOIL HAS OCCURRED.

B.11/22/88 - OSC, TAT, AND ERCS MEET AT THE SITE TO EVALUATE OPTIONS FOR AN UNDERFLOW ADDITION TO THE RETAINING WALL WHICH WOULD ALLEVIATE EXCESS RAIN WATER PRESSURE ON THE WALL. TAT PROVIDED ERCS WITH A PRELIMINARY DRAWING OF THE PROPOSED CONSTRUCTION. OSC TASKS GUARDIAN TO RESTAGE EMPTY DRUMS DISPLACED DURING THE HEAVY RAINS AND TO DRAIN OFF THE EXCESS WATER INTO THE SECONDARY CONTAINMENT.

C.11/23/88 - PERSONNEL ON SITE: TAT 1, ERCS 4

D.ESTIMATED COSTS TO DATE (COB 11/08/88):

	EST COST TO DATE	CEILING
EPA	\$ 6,500	\$ 9,000
EPA INDIRECT	10,500	16,000
TAT	20,000	20,000
ERCS	65,000	135,000
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TOTAL	\$102,000	\$185,000

E.WEATHER:OVERCAST AND COOL, TEMPERATURES IN THE MID TO UPPER 50'S.

II.ACTIONS TAKEN

A.ERCS RELOCATED 22 DRUMS FROM THE NORTHWESTERN CORNER OF THE SITE TO THE CENTER OF SITE. DRUMS WERE DISPLACED DURING HEAVY RAINS OF THE PREVIOUS WEEK.

B.TAT CONTINUES TO EVALUATE OPTIONS FOR PROPOSED UNDER FLOW CONSTRUCTION.

III.FUTURE PLANS

A.OSC AND TAT TO CONTINUE EVALUATION OF OPTIONS FOR PROPOSED UNDER FLOW CONSTRUCTION.

B.ERCS TO REMOBE ONSITE 12/01/88.

 DOUGLAS FOX, OSC
 EPA REGION III
 PHILADELPHIA, PA

AR100125

To: ERD/OERR (EPA5511)
To: J.LUFFY (EPA9314)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)

From: REGION03.TAT (EPA9322) Delivered: Sat 3-Dec-88 19:20 EST S
Subject: METRO CONTAINER SITE POLREP #28
Mail Id: IPM-163-881203-174140069

POLREP #28

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1800 HOURS, FRIDAY 12/2/88)

A. DUE TO REOCCURRING PROBLEMS ASSOCIATED WITH THE RETAINING WALL AND THE HEAVY RAINFALL RECEIVED IN THE PHILADELPHIA AREA DURING THE LAST TWO WEEKS, STABILIZATION EFFORTS RESTARTED 12/1/88 AND ARE TO CONTINUE THROUGH 12/5/88.

B. PERSONNEL:

EPA-1

TAT-2

MINI-ERCS-8

C. ESTIMATED COSTS TO DATE (COB 12/1/88):

	EST COST TO DATE	CEILING
EPA	\$ 5,500	\$ 9,000
EPA INDIRECT	10,500	16,000
TAT	22,000	25,000
MINI-ERCS	83,000	135,000

TOTAL	\$ 121,000	\$ 185,000

D. WEATHER: CLEAR AND COOL; TEMPERATURES IN THE LOW 40'S. RAINFALL FOR PERIOD BETWEEN 11/15/88 AND 11/30/88 WAS 3.86 INCHES.

II. ACTIONS TAKEN:

A. ON 12/1/88, OSC, TAT, GUARDIAN MET AT SITE TO REVIEW PROPOSED PLANS TO REINFORCE THE RETAINING WALL BY RETRENCHING THE AREA AND INSTALLING ADDITIONAL CLAY BACKFILL. ALSO DISCUSSED WERE PLANS TO PUMP OFF THE SECONDARY CONTAINMENT OF THE LAGOON, WHICH IS OVERFLOWING, AND INSTALLING AN UNDERFLOW PIPING SYSTEM, WITH CONTROL VALVES TO ALLEVIATE EXCESSIVE PRESSURE ON THE WALL DUE TO HEAVY RAINFALL.

B. REMOVAL ACTIVITIES RESTARTED AT 0700 HOURS, 12/2/88. MINI-ERCS RETRENCHED AREA OF RETAINING WALL AND BUILT A FOUNDATION OF COMPACTED CLAY FOR THE WALL.

C. AFTER EVALUATING ALTERNATIVES FOR CONTROLLING THE SECONDARY CONTAINMENT PROBLEMS, THE OSC DIRECTED MINI-ERCS TO OBTAIN A 10,000 GALLON TANK INTO WHICH THE MATERIAL, PRIMARILY RAINWATER MIXED WITH SLUDGE, CAN BE TRANSFERRED.

D. OSC DISCUSSED PLANS OF WORKING THROUGH THE WEEKEND WITH THE PRESIDENT OF METRO ENTERPRISES (MASLOW) TO INSURE SITE ACCESS IS AVAILABLE TO THE WORK CREW.

III. FUTURE PLANS

A. MINI-ERCS TO CONTINUE TO BACKFILL TRENCH WITH COMPACTED CLAY AND TO RESET THE RETAINING WALL.

B. MINI-ERCS TO INSTALL UNDERFLOW PIPING SYSTEM AT RETAINING WALL.

C. SECONDARY CONTAINMENT TO BE PUMPED OFF INTO HOLDING TANK.

D. ARRANGEMENTS TO BE MADE FOR DISPOSAL OF SECONDARY CONTAINMENT MATERIALS.

DOUGLAS FOX, OSC
EPA REGION III
PHILADELPHIA, PA

AP00126

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: D.FOX (EPA9344)
To: RRC (EPA9374)
From: D.FOX (EPA9344) Delivered: Mon 5-Dec-88 17:13 EST Sys 16
Subject: METRO POLREP 29
Mail Id: IFM-163-881205-155071105

POLREP #29

METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1800 HOURS, SATURDAY 12/3/88)

A. DUE TO REOCCURRING PROBLEMS ASSOCIATED WITH THE RETAINING WALL AND THE HEAVY RAINFALL RECEIVED IN THE PHILADELPHIA AREA DURING THE LAST TWO WEEKS, STABILIZATION EFFORTS RESTARTED 12/1/88 AND ARE TO CONTINUE THROUGH 12/5/88.

B. PERSONNEL:

EPA-1

TAT-2

MINI-ERCS-7

C. ESTIMATED COSTS TO DATE (COB 12/3/88):

	EST COST TO DATE	CEILING
EPA	\$ 6,000	\$ 9,000
EPA INDIRECT	11,000	16,000
TAT	23,000	25,000
MINI-ERCS	93,000	135,000

TOTAL	\$ 133,000	\$ 185,000

D. WEATHER: CLEAR AND COOL; TEMPERATURES IN THE LOW 40'S.

II. ACTIONS TAKEN:

A. MINI-ERCS CONTINUED RETRENCHING AREA OF RETAINING WALL. FOUNDATION OF COMPACTED CLAY FOR THE WALL COMPLETED. HALF THE RETAINING WALL HAS BEEN RESET.

B. 9,000 GALLONS OF THE SECONDARY CONTAINMENT, WHICH WAS ON THE VERGE OF OVERFLOWING AND THE EARTHEN BERM HAS SHOWN EVIDENCE OF STRESS CRACKING, WAS PUMPED OFF INTO A HOLDING TANK THIS DATE.

C. OSC AND TAT TAKE SEVERAL SAMPLES OF THE LAGOON TO GAUGE THE DEPTH OF THE SLUDGE AND QUANTIFY THE LAYERING OF SLUDGE AND WATER IN IT.

III. FUTURE PLANS

A. MINI-ERCS TO COMPLETE BACKFILLING TRENCH WITH COMPACTED CLAY AND TO RESET THE RETAINING WALL.

B. MINI-ERCS TO INSTALL A VALVED UNDERFLOW PIPING SYSTEM AT RETAINING WALL.

C. REPRESENTATIVE OF DISPOSAL COMPANY TO BE ONSITE MONDAY, DECEMBER 5, 1988, TO GIVE COST ESTIMATES ON SLUDGE DISPOSAL FROM LAGOON AND SECONDARY CONTAINMENT.

D. OSC TO SUBMIT ADDITIONAL FUNDING REQUEST TO CONTINUE STABILIZATION EFFORTS AT SITE.

E. DUE TO THE AMOUNT OF WORK ACCOMPLISHED THIS DATE AND THE PROJECTED FORECAST OF NO RAIN FOR AT LEAST FOUR DAYS, AS A COST SAVING MEASURE, WORK WILL RESUME ON MONDAY, DECEMBER 5, 1988.

DOUGLAS FOX, OSC
EPA REGION III
PHILADELPHIA, PA

AR100127

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: D.FOX (EPA9344)
To: RRC (EPA9374)
From: D.FOX (EPA9344) Delivered: Thu 8-Dec-88 7:06 EST Sys 163
Subject: METRO POLREP 30
Mail Id: IPM-163-881208-063920246

POLREP #30

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1800 HOURS, MONDAY 12/5/88)

A. DUE TO REOCCURRING PROBLEMS ASSOCIATED WITH THE RETAINING WALL AND THE HEAVY RAINFALL RECEIVED IN THE PHILADELPHIA AREA DURING THE LAST TWO WEEKS, STABILIZATION EFFORTS RESTARTED 12/1/88 AND ARE TO CONTINUE THROUGH 12/6/88.

B. PERSONNEL:

EPA-1

TAT-2

MINI-ERCS-6

C. ESTIMATED COSTS TO DATE (COB 12/3/88):

	EST COST TO DATE	CEILING
EPA	\$ 6,000	\$ 9,000
EPA INDIRECT	11,000	16,000
TAT	23,000	25,000
MINI-ERCS	93,000	135,000

TOTAL	\$ 133,000	\$ 185,000

D. WEATHER: CLEAR AND COOL; TEMPERATURES IN THE LOW 40'S.

II. ACTIONS TAKEN:

A. MINI-ERCS CONTINUED REENFORCING RETAINING WALL THIS DATE. SECOND HALF OF WALL RETRENCHED AND BACKFILLED.

B. ARRANGEMENTS WERE COMPLETED THIS DATE FOR DISPOSAL OF THE WASTE MATERIAL IN THE SECONDARY CONTAINMENT OF THE LAGOON.

III. FUTURE PLANS

A. MINI-ERCS TO COMPLETE BACKFILLING TRENCH WITH COMPACTED CLAY AND TO RESET THE RETAINING WALL.

B. MINI-ERCS TO INSTALL A VALVED UNDERFLOW PIPING SYSTEM AT RETAINING WALL.

C. WASTE FROM SECONDARY CONTAINMENT TO BE PUMPED OFF AND SENT FOR DISPOSAL AT WASTE CONVERSIONS, HATFIELD, PA. ON THURSDAY, DECEMBER 8, 1988.

D. OSC TO SUBMIT ADDITIONAL FUNDING REQUEST TO CONTINUE STABILIZATION EFFORTS AT SITE.

DOUGLAS FOX, OSC
EPA REGION III
PHILADELPHIA, PA

AR100128

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: D.FOX (EPA9344)
To: RRC (EPA9374)
From: D.FOX (EPA9344) Delivered: Thu 8-Dec-88 7:07 EST Sys 163
Subject: METRO POLREP 31
Mail Id: IPM-163-881208-064080549

POLREP #31

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1800 HOURS, TUESDAY 12/6/88)

A. DUE TO REOCCURRING PROBLEMS ASSOCIATED WITH THE RETAINING WALL AND THE HEAVY RAINFALL RECEIVED IN THE PHILADELPHIA AREA DURING THE LAST TWO WEEKS, STABILIZATION EFFORTS RESTARTED 12/1/88 AND CONTINUED THROUGH 12/6/88.

B. PERSONNEL:

TAT-2

MINI-ERCS-6

C. ESTIMATED COSTS TO DATE (COB 12/5/88):

	EST COST TO DATE	CEILING
EPA	\$ 6,500	\$ 9,000
EPA INDIRECT	11,500	16,000
TAT	24,000	25,000
MINI-ERCS	105,000	135,000

TOTAL	\$ 146,000	\$ 185,000

D. WEATHER: CLEAR AND COOL; TEMPERATURES IN THE LOW 40'S.

II. ACTIONS TAKEN:

A. MINI-ERCS COMPLETED REENFORCING RETAINING WALL. RESETTING OF WALL AND COMPACTING OF CLAY FINISHED 1700 HOURS THIS DATE.

B. TWO SIX INCH VALVED PIPES INSTALLED AT RETAINING WALL TO ALLOW CONTROLLED DISCHARGE OF RAINWATER FROM SITE.

III. FUTURE PLANS

A. WASTE FROM SECONDARY CONTAINMENT TO BE PUMPED OFF AND SENT FOR DISPOSAL AT WASTE CONVERSIONS, HATFIELD, PA. ON THURSDAY, DECEMBER 8, 1988.

B. OSC TO SUBMIT ADDITIONAL FUNDING REQUEST TO CONTINUE STABILIZATION EFFORTS AT SITE.

DOUGLAS FOX, OSC
EPA REGION III
PHILADELPHIA, PA

AR100129

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: D.FOX (EPA9344)
To: RRC (EPA9374)
From: D.FOX (EPA9344) Delivered: Mon 12-Dec-88 15:39 EST Sys 1
Subject: METRO POLREP 32
Mail Id: IPM-163-881212-140990388

POLREP #32

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1800 HOURS, THURSDAY 12/8/88)

A. WORK AT THE SITE CONTINUED THIS DATE TO PROVIDE ADDITIONAL STABILIZATION MEASURES.

B. PERSONNEL:

EPA-1

TAT-2

MINI-ERCS-2

C. ESTIMATED COSTS TO DATE (COB 12/8/88):

	EST COST TO DATE	CEILING
EPA	\$ 7,000	\$ 9,000
EPA INDIRECT	12,000	16,000
TAT	25,000	25,000
MINI-ERCS	105,000	135,000

TOTAL	\$ 149,000	\$ 185,000

D. WEATHER: CLEAR AND COOL; TEMPERATURES IN THE LOW 40'S.

II. ACTIONS TAKEN:

A. 10,000 GALLONS OF SECONDARY CONTAINMENT WASTE PUMPED OFF BY WASTE CONVERSIONS THIS DATE.

B. TWO SUMPS IN THE SECONDARY CONTAINMENT DISCOVERED DURING PUMPING OPERATION, WHICH WERE ALSO EMPTIED.

III. FUTURE PLANS

A. WASTE FROM 10,000 GALLON HOLDING TANK TO BE PUMPED OFF AND SENT FOR DISPOSAL AT WASTE CONVERSIONS, HATFIELD, PA. ON FRIDAY, DECEMBER 9, 1988.

B. OSC TO SUBMIT ADDITIONAL FUNDING REQUEST TO CONTINUE STABILIZATION EFFORTS AT SITE.

DOUGLAS FOX, OSC
EPA REGION III
PHILADELPHIA, PA

AR100130

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: D.FOX (EPA9344)
To: RRC (EPA9374)
From: D.FOX (EPA9344) Delivered: Mon 12-Dec-88 15:41 EST Sys 1
Subject: METRO POLREP 33
Mail Id: IPM-163-881212-141190169

POLREP #33

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1800 HOURS, FRIDAY 12/9/88)

A. WORK AT THE SITE CONTINUED THIS DATE TO PROVIDE ADDITIONAL STABILIZATION MEASURES.

B. PERSONNEL:

EPA-1

TAT-1

MINI-ERCS-1

C. ESTIMATED COSTS TO DATE (COB 12/8/88):

	EST COST TO DATE	CEILING
EPA	\$ 7,000	\$ 9,000
EPA INDIRECT	12,000	14,000
TAT	25,000	27,000
MINI-ERCS	105,000	135,000

TOTAL \$ 149,000 \$ 185,000

\$2,000 SHIFTED FROM EPA INDIRECT TO TAT CEILING THIS DATE.

D. WEATHER: OVERCAST AND COLD; TEMPERATURES IN THE LOW 30'S.

II. ACTIONS TAKEN:

A. AN ADDITIONAL 5,000 GALLONS OF SECONDARY CONTAINMENT WASTE PUMPED OFF BY WASTE CONVERSIONS THIS DATE AFTER THE TWO SUMPS DISCOVERED 12/8/88 REFILLED WITH WATER FROM THE LAGOON.

B. OSC CONTACTED METRO PRESIDENT MASLOW CONCERNING THE SUMPS AND THE UNDERGROUND PIPING SYSTEM THAT CONNECTS THE LAGOON AND THE SECONDARY CONTAINMENT. MR. MASLOW DID NOT HAVE ANY ADDITIONAL INFORMATION CONCERNING THIS SYSTEM.

C. OSC AND TAT BENCHMARKED LEVELS IN THE LAGOON AND THE SECONDARY CONTAINMENT SO THAT CHANGES IN EITHER ARE APPARENT.

III. FUTURE PLANS

A. OSC TO SUBMIT ADDITIONAL FUNDING REQUEST TO CONTINUE STABILIZATION EFFORTS AT SITE.

B. TAT TO CONTINUE MONITORING LEVELS IN THE LAGOON AND SECONDARY CONTAINMENT WHILE AWAITING ADDITIONAL FUNDING.

**DOUGLAS FOX, OSC
EPA REGION III
PHILADELPHIA, PA**

AR100131

To: ERD/OERR (EPA5511)
To: J.LUFFY (EPA9314)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Mon 9-Jan-89 12:12 EST S
Subject: METRO CONTAINER POLREP #34
Mail Id: IPM-163-890109-109910150

POLREP #34

METRO CONTAINER CERCLA REMOVAL PROJECT

TRAINER, DELAWARE COUNTY, PA

ATTN: STEVE JARVELA, CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1800 HOURS, FRIDAY 1/6/89)

A. SITE IS DEMOBILIZED PENDING FURTHER STABILIZATION ACTIONS.

B. PERSONNEL:

TAT-2

MINI-ERCS-1

C. ESTIMATED COSTS TO DATE (COB 1/6/89):

	EST COST TO DATE	CEILING
EPA	\$ 7,000	\$ 9,000
EPA INDIRECT	12,000	14,000
TAT	27,000	27,000
MINI-ERCS	110,000	135,000

TOTAL	\$ 156,000	\$ 185,000
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D. WEATHER: OVERCAST AND COLD; TEMPERATURES IN THE LOW 20'S.

II. ACTIONS TAKEN:

A. TAT INVESTIGATED VARIOUS DISPOSAL OPTIONS FOR THE ONSITE SLUDGE WASTE 12/19/88 THROUGH 1/4/89. TAT ALSO MONITORED LIQUID LEVELS IN THE LAGOON AND SECONDARY CONTAINMENT OVER THIS TIME PERIOD. NO APPRECIABLE CHANGE IN LEVELS WAS OBSERVED.

B. ON 1/5/89, TAT TOOK THREE SETS OF SAMPLES FROM THE LAGOON AND SECONDARY CONTAINMENT DESIGNATED FOR DISPOSAL COMPANIES WHICH INTEND TO BID ON DISPOSAL OF SLUDGE WASTE.

C. TAT CHECKED INTO COMPLIANCE OF THE THREE FACILITIES EXPECTED TO BID ON THE DISPOSAL OF METRO CONTAINER SLUDGE WASTE WITH RCRA COMPLIANCE OFFICERS OF REGIONS II AND III. DELAWARE CONTAINER AND S&W WASTE ARE IN COMPLIANCE AT THIS TIME AND ARE PERMITTED TO ACCEPT SUPERFUND SITE WASTE. SOLVENT RECOVERY SERVICES IS CURRENTLY NOT IN COMPLIANCE DUE TO LAND BAN VIOLATIONS BUT IS UNDERGOING CORRECTIVE ACTION WHICH MAY PLACE IT IN COMPLIANCE IN THE NEAR FUTURE.

D. REPRESENTATIVES FROM DELAWARE CONTAINER, S&W WASTE, AND SOLVENT RECOVERY SERVICES ONSITE TO MEET WITH TAT AND MINI-ERCS REPRESENTATIVES, VIEW THE SITE AND RECEIVE SAMPLES OF THE LAGOON AND SECONDARY CONTAINMENT WASTE.

E. OSC FOX RECEIVES CONFIRMATION THAT THE METRO CONTAINER CEILING INCREASE REQUEST HAS BEEN APPROVED THIS DATE. TOTAL PROJECT CEILING HAS BEEN INCREASED TO \$769,000.

III. FUTURE PLANS

A. BIDS FOR SLUDGE DISPOSAL FROM COMPANIES ONSITE THIS DATE EXPECTED WEEK OF 1/16/89.

B. TAT TO CONTINUE MONITORING LIQUID LEVELS IN THE LAGOON AND SECONDARY CONTAINMENT.

DOUGLAS FOX, OSC
EPA REGION III
PHILADELPHIA, PA

AR100132

To: ERD/OERR (EPA5511)
To: OPA/REG.III (EPA9315)
To: REGION03.TAT (EPA9322)
To: D.FOX (EPA9344)
To: RRC (EPA9374)
From: D.FOX (EPA9344) Delivered: Thu 9-Feb-89 10:20 EST Sys
163 (55)
Subject: METRO POLREP 35
Mail Id: IPM-163-890209-093140566

POLREP #35
METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA

ATTN: CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1800 HOURS, MONDAY 2/6/89)

A. SITE IS DEMOBILIZED PENDING FURTHER STABILIZATION ACTIONS.

B. PERSONNEL: EPA-1, TAT-1

C. ESTIMATED COSTS TO DATE (COB 2/6/89):

	EST COST TO DATE	CEILING
EPA	\$ 7,000	\$ 9,000
EPA INDIRECT	12,000	14,000
TAT	27,000	27,000
MINI-ERCS	110,000	135,000

TOTAL	\$ 156,000	\$ 185,000

D. WEATHER: OVERCAST AND COLD; TEMPERATURES IN THE LOW 30'S.

II. ACTIONS TAKEN:

A. OSC FOX CONTACTED 2/3/89 BY M. BUDIN, AEGIS CORPORATION, CONTRACTOR FOR THE PRP STEERING COMMITTEE. MR. BUDIN INFORMED OSC FOX THAT A REPRESENTATIVE OF SUN, INC. WHO HAD BEEN ON SITE AT METRO, HAD SEEN SEVERAL BLUE POLY DRUMS WHICH CONTAINED WHITE CRYSTALLINE MATERIAL LABELLED PICRIC ACID.

B. OSC FOX DISPATCHED OSC POWELL, ALONG WITH TAT, TO THE SITE TO CONFIRM THIS SIGHTING AND LOCATE THESE DRUMS. OSC POWELL AND TAT COULD NOT FIND THE DRUMS, ALTHOUGH SEVERAL BLUE POLY DRUMS WERE NOTED AS CONTAINING WHITE CRYSTALLINE MATERIAL, BUT WERE NOT LABELLED.

C. OSC FOX CONTACTED L. MASLOW, OWNER OF THE METRO PROPERTY, WHO ASSURED HIM NO ADDITIONAL DRUMS WERE BEING DUMPED AT THE FACILITY.

D. OSC POWELL CONTACTED M. COE, EPA/ORC, WHO INFORMED THE OSC THAT INSTALLING A SECURITY GUARD AT THE SITE WAS ADVISABLE IN LIGHT OF POSSIBLE DRUM ABANDONING.

E. OSC FOX CONTACTED MINI-ERCS CONTRACTOR RESPONSE MANAGER AND ARRANGED INSTALLATION OF A SECURITY GUARD AT THE SITE ASAP. THE GUARD IS RESPONSIBLE TO LOG ALL PERSONNEL AND VEHICLES ENTERING THE SITE AND TO RECORD THEIR ONSITE ACTIVITIES.

F. GUARD INSTALLED AT SITE 0001 HOURS, 2/5/89.

G. OSC FOX CONTACTED BY EPA/ENFORCEMENT FALKIN 2/6/89, WHO INFORMED HIM THAT THE PRP STEERING COMMITTEE HAS SUBMITTED A WORKPLAN FOR CLEANUP OF METRO CONTAINER SITE. THE WORKPLAN ADDRESSES CLEANUP OF SURFACE CONTAMINATION ISSUES.

III. FUTURE PLANS

A. SECURITY GUARD TO BE CONTINUE DOCUMENTING PERSONNEL ENTERING THE SITE.

B. TAT TO CONTINUE MONITORING LIQUID LEVELS IN THE LAGOON, THE SECONDARY CONTAINMENT AREA AND THE WATER LEVELS AT THE RETAINING WALL.

C. OSC AND TAT TO REVIEW PRP PROPOSED WORKPLAN AND SUBMIT COMMENTS TO EPA/ ENFORCEMENT BY 2/16/89.

DOUGLAS FOX, OSC
EPA REGION III
PHILADELPHIA, PA

AR100133

To: ERD/OERR (EPA5511)
To: J.LUFFY (EPA9314)
To: REGION03.TAT (EPA9322)
To: C.KLEEMAN (EPA9340)
To: D.FOX (EPA9344)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Wed 22-Feb-89 8:33 EST Sys
163 (48)
Subject: metro container polrep #36
Mail Id: IPM-163-890222-077080780

POLREP #36

**METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: CHARLES KLEEMAN AND TIM FIELDS**

I. SITUATION (1800 HOURS, MONDAY 2/20/89)

**A. REMOVAL OPERATIONS RESTARTED THIS DATE. SECURITY REMAINS
ON SITE TO LOG ALL VISITORS AND VEHICLES ENTERING THE SITE.**

B. PERSONNEL: EPA-1, TAT-2, MINI-ERCS-7

C. ESTIMATED COSTS TO DATE (COB 2/20/89):

	EST COST TO DATE	CEILING
EPA	\$ 7,500	\$ 16,500
EPA INDIRECT	13,000	30,000
TAT	33,000	35,000
MINI-ERCS	200,000	594,000

TOTAL \$ 253,000 \$ 675,500

**15% EXTRAMURAL CONTINGENCY - \$94,350 FOR A TOTAL PROJECT
CEILING OF \$769,850.**

D. WEATHER: SUNNY WITH TEMPERATURES IN THE MID 40'S.

II. ACTIONS TAKEN:

**A. REVEIW OF THE PRP STEERING COMMITTEE SCOPE OF WORK FOR THE
SITE COMPLETED 2/17/89.**

**B. MINI-ERCS RESTAGING EMPTY DRUMS THAT HAD COLLECTED AGAINST
THE RETAINING WALL AND RECOMPACTED CLAY AROUND RETAINING WALL.**

**C. 10,000 GAL. OF A NON-HAZARDOUS LIQUID WAS PUMPED FROM
THE HOLDING TANK.**

D. HOLDING TANK WAS REMOVED OFF-SITE.

E. SECURITY LOCK WAS PLACED ON THE FRONT AND SIDE GATES.

III. FUTURE PLANS

**A. SECURITY GUARD TO CONTINUE DOCUMENTING PERSONNEL
ENTERING THE SITE.**

**B. TAT TO CONTINUE MONITORING LIQUID LEVELS IN THE LAGOON,
THE SECONDARY CONTAINMENT AREA AND THE WATER LEVELS AT THE
RETAINING WALL.**

**C. AS DIRECTED BY OSC FOX, TAT'S WILL CONTINUE TO
MONITOR LIQUID LEVELS IN THE SECONDARY CONTAINMENT AND PROVIDE A
PRIORITY POLLUTANT SAMPLE. THIS OPERATION WILL CONTINUE UNTIL
FURTHER ADVISED BY OSC FOX.**

**D. COMMENTS ON THE PRP STEERING COMMITTEE SCOPE OF WORK TO BE
FORWARDED TO EPA/ENFORCEMENT FALKIN.**

**E. SECONDARY CONTAINMENT WALL TO BE ADJUSTED TO MEET THE
ONGOING PRESSURE OF THE COLLECTED RAINWATER WITHIN THE RETAINING
WALL TO PREVENT ANY ADDITIONAL UNDERMINING.**

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: D.FOX (EPA9344)
To: RRC (EPA9374)
From: D.FOX (EPA9344) Delivered: Fri 24-Feb-89 13:33 EST Sys 16
(94)
Subject: METRO CONTAINER POL REP 37
Mail Id: IPM-163-890224-122051133

POLREP #37
METRO CONTAINER SITE
TRAINER, DELAWARE COUNTY, PA
ATTN: TIM FIELDS AND CHARLIE KLEEMAN

I. SITUATION (1500 HRS WEDNESDAY FEBRUARY 22, 1989)

- A. EPA ATTENDS MEETING WITH THE PRP STEERING COMMITTEE THIS DATE TO REVIEW THE PROPOSED SCOPE OF WORK.
- B. THE FOLLOWING REPRESENTATIVES WERE PRESENT AT THE MEETING:
 - EPA OSC - DOUG FOX
 - EPA ENFORCEMENT - LARRY FALKIN
 - NOAA - ALYCE FRITZ
 - TAT - JEFF LIEBERMAN
 - PADER - PAUL DIRENZO
 - SUN - NANCY KILBOURN
 - MOBIL - ROBERT BRENNER
 - AGES - MICHAEL BUDIN

II. ACTIONS TAKEN

- A. AT 0900 HRS, FOX, FALKIN, FRITZ, AND LIEBERMAN HELD A PRE-MEETING DISCUSSION TO GO OVER THE PRP SCOPE OF WORK AND STRATEGY FOR HANDLING THE MEETING AGENDA.
- B. AT 0930, THE MEETING BEGAN WITH FALKIN HANDING OUT THE LATEST DRAFT VERSION OF THE CONSENT ORDER, AND OSC FOX DISCUSSED THE MOST RECENT ACTIONS TAKEN ONSITE INCLUDING THE WALL REPAIRS AND DISPOSAL APPROVALS FOR THE LAGOON SLUDGE.
- C. IT WAS MUTUALLY ACCEPTABLE TO ALL PARTIES THAT RINSATE FROM CLEANING DRUMS OR TANKS ONSITE WOULD BE COLLECTED AND DISPOSED OF IN AN APPROPRIATE MANNER.
- D. THE STEERING COMMITTEE STATED THAT THEY MIGHT HAVE PROBLEMS GETTING APPROVAL FROM THE TRUSTEE IN BANKRUPTCY TO DISPOSE OF DRUMS AND TANKS LISTED AS ASSETS. FALKIN POINTED OUT THAT THE CLEANUP COSTS ASSOCIATED WITH THE DRUMS AND TANKS WOULD PROBABLY EXCEED THEIR SALVAGE VALUE MAKING THEM A NEGATIVE ASSET.
- E. EPA OUTLINED THAT THEY WANTED A SAMPLING AND MONITORING PROGRAM FOR THE STREAM WITH A TRIGGER ACTION LEVEL FOR CLEANUP. THE STEERING COMMITTEE'S POSITION WAS THAT THIS WAS BEYOND THE SCOPE OF A REMOVAL ACTION AND THAT THE STREAM WAS PROBABLY POLLUTED FROM A VARIETY OF SOURCES. THE COMMITTEE DID NOT WANT TO BE HELD RESPONSIBLE FOR CLEANING CONTAMINATION FROM SOURCES OTHER THAN METRO.
- F. EPA ALSO REQUIRED THAT THE SOIL REMOVAL BE TIED TO QUANTIFIED CONCENTRATION LEVELS WHICH CAN BE DOCUMENTED AS PROTECTIVE OF HUMAN HEALTH AND THE ENVIRONMENT. THE STEERING COMMITTEE HAS

STATED THAT THEY WOULD REMOVE "VISIBLY STAINED SOIL" BECAUSE EVEN THIS WOULD GO BEYOND THE ORIGINAL SCOPE OF THE REMOVAL ACTION.

- G. THE MEETING CONCLUDED WITH EPA AND THE STEERING COMMITTEE AGREEING TO PURSUE INTERNAL DISCUSSIONS TO COME A SETTLEMENT REGARDING THE STREAM MONITORING AND SOIL CONCENTRATION LEVEL ISSUES.
- H. OSC FOX DIRECTED TAT THIS DATE TO MOBILIZE TO THE SITE TO OBSERVE IF THE HEAVY RAINS WERE CAUSING ANY OVERFLOW PROBLEMS AND TO COLLECT A SAMPLE OF THE POOLED LIQUID IN THE DIKE AREA. TAT THEN DELIVERED THE SAMPLE TO MINI-ERCS FOR ANALYTICAL PROCESSING.

III. FUTURE PLANS

- A. OSC FOX IS PLANNING TO REMOBILIZE ERCS BRIEFLY NEXT WEEK TO PUMP OUT THE LAGOON CONTAINMENT AREA. RECENT HEAVY RAINS HAVE INCREASED THE THREAT OF THE LAGOON OVERFLOWING OR OTHERWISE BREACHING ITS CONTAINMENT.
- B. THE STEERING COMMITTEE IS HAVING A CONFERENCE CALL ON FRIDAY AFTERNOON 2/24/89. THE RESULTS OF THESE DISCUSSIONS WILL THEN BE COMMUNICATED TO EPA ENFORCEMENT FALKIN ASAP.

DOUG FOX, OSC
USEPA REGION III
PHILADELPHIA, PA

AR100135

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: W.LEE (EPA9346)
To: RRC (EPA9374)
To: F.HENDERSON (EPX2992)
From: REGION03.TAT (EPA9322) Delivered: Thu 13-July-89 10:19 EDT Sy
Subject: SPECTRON POLREP #38
Mail Id: IPM-163-890713-092950169

POLREP #38

SPECTRON, INC. CERCLA REMOVAL SITE
ELKTON, CECIL COUNTY, MARYLAND
ATTN: STEVE JARVELA AND TIM FIELDS

I. SITUATION (1800 HOURS, WENESDAY 07/12/89)

- A. 24- HOUR SITE SECURITY AND FIRE WATCH CONTINUE WITH ROUNDS BEING MADE AT HOURLY INTERVALS TO INSURE THAT NO ABOVE BACKGROUND LEVELS OF ORGANIC VAPORS ARE LEAVING SITE.
- B. WEATHER: NICE. TEMPS IN MID 80'S POSSIBILITY FOR SHOWERS IN THE AFTERNOON.
- C. PERSONNEL ON SITE WENESDAY, 07/12/89
EPA-1
TAT-2
ERCS-16
- D. ESTIMATED COSTS (COB 7/10/89):

	\$ COSTS	\$ CEILING
ERCS	186,795	260,000
TAT	42,520	59,349
EPA DIRECT	15,065	25,000
EPA INDIRECT	22,656	36,200
CONTINGENCY		70,757
TOTAL	<u>267,036</u>	<u>451,306</u>

TOTAL PROJECT CEILING \$492,806

II. ACTIONS TAKEN

- A. ERCS INITIATED CONSTRUCTION OF POOLING AREA FOR WASTE WATER TREATMENT SYSTEM.
- B. ERCS CONTINUES TO INSPECT AND SAMPLE DRUMS IN THE DRUM STAGING AREA. 71 SAMPLES WERE TAKEN FROM DRUMS WHICH CONTAINED SOLIDS. TO DATE, 1124 DRUMS HAVE BEEN EXAMINED AND A TOTAL OF 358 LIQUID SAMPLES COLLECTED. TO DATE, 146 SOLID CONTAINING DRUMS HAVE BEEN EXAMINED AND SAMPLED.

AR100136

C. OSC LEE INFORMED BY RP SPECTRON THAT SITE ELECTRICITY WILL BE TURNED OFF ON FRIDAY (07/14/89). OSC LEE INFORMS ERCS OF THIS AND INSTRUCTS THEM TO TAKE NECESSARY ACTIONS TO INSURE UNINTERRUPTED SERVICE.

D. FAS HENRY AND FAO MARZULLI ONSITE TO ASSESS SITE EXPENSES.

III. FUTURE PLANS

A. ERCS TO CONTINUE 24-HOUR SITE SECURITY AND FIRE WATCH.

B. ERCS TO CONTINUE SAMPLING OF SOLIDS IN THE DRUM STORAGE AREA. OVERPACKING OF DRUMS IS ALSO TO CONTINUE.

C. ERCS TO CONTINUE ASSEMBLY OF WATER TREATMENT SYSTEM COMPONENTS.

D. TAT DUE TO RECEIVE ANALYTICAL ON AIR MONITORING THIS WEEK.

E. OSC LEE AND TAT GUARNI AND ADDITIONAL TAT SUPPORT TEAM TO INSPECT HALBY CHEMICAL LOCATED ON TERMINAL ROAD IN WILMINGTON, DE ON THURSDAY 07/13/89.

WALTER F. LEE, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

AR100137

To: ERD/OERR (EPA5511)
To: J.VINISKI (EPA9314)
To: REGION03.TAT (EPA9322)
To: C.KLEEMAN (EPA9340)
To: D.FOX (EPA9344)
To: RRC (EPA9374)
From: D.FOX (EPA9344) Delivered: Wed 17-May-89 16:48 EDT Sys
163 (54)
Subject: METRO POLREP 39
Mail Id: IPM-163-890517-151331205

POLREP #39
METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1800 HOURS, 05/16/89)

- A. SECURITY REMAINS ON SITE TO LOG ALL VISITORS AND VEHICLES ENTERING THE SITE.
- B. PERSONNEL: EPA-1, TAT-1, MINI-ERCS-2
- C. ESTIMATED COSTS TO DATE (COB 05/16/89):

	EST COST TO DATE	CEILING
EPA	\$ 8,000	\$ 16,500
EPA INDIRECT	14,000	30,000
TAT	42,000	50,000
MINI-ERCS	225,000	594,000
	-----	-----
TOTAL	\$ 289,000	\$ 690,500

II. ACTIONS TAKEN:

- A. ON 5/11/89, DURING ROUTINE SITE VISIT BY TAT TO CHECK ON LEVELS IN THE LAGOON AND SECONDARY CONTAINMENT, TAT NOTED THE LEVEL IN THE SECONDARY CONTAINMENT HAD RISEN TO NEAR CAPACITY DUE TO RECENT HEAVY RAINS. TAT INFORMED OSC OF SITUATION, WHO DIRECTED MINI-ERCS TO ARRANGE FOR TRANSPORTATION AND DISPOSAL OF MATERIAL.
- B. TAT DRAINED RETAINING WALL AREA OF ACCUMULATED RAINWATER 5/11/89 AND 5/16/89.
- C. MINI-ERCS PUMPED 6,500 GALLONS OF A NON-HAZARDOUS WASTE LIQUID FROM THE SECONDARY CONTAINMENT AREA AND THE CONCRETE TANK, 5/16/89. THE LIQUIDS PUMPED WERE TRANSPORTED TO WASTE CONVERSIONS, IN HATFIELD, PA.
- D. TAT INFORMED BY SECURITY GUARD THAT METRO CONTAINER HAD FORMALLY ABANDONED PROPERTY AND UTILITIES TO THE SITE WERE BEING TURNED OFF.
- E. OSC INFORMED BY EPA/CRES WOLPER THAT THE PRP STEERING COMMITTEE WAS EXPECTED TO MAKE A DECISION ON FUNDING FOR SITE CLEANUP WEEK OF 5/22/89. THE PRP COMMITTEE HAS BEEN SPLIT BY CLEANUP WORK PLAN DIFFERENCES AND DIFFERENCES WITH EPA/CRES. PART OF THE PRP COMMITTEE IS CONTEMPLATING CONTINUING WITH PLANNED CLEANUP ACTIVITIES.

III. FUTURE PLANS

- A. SECURITY GUARD TO CONTINUE DOCUMENTING PERSONNEL ENTERING THE SITE 24 HOURS PER DAY. THE NEED FOR SECURITY IS EXPECTED TO BE ELIMINATED, DUE TO EPA ACQUIRING FULL CONTROL OF THE PROPERTY THROUGH ABANDONMENT BY OWNER/OPERATOR.
- B. TAT TO CONTINUE MONITORING LIQUID LEVELS IN THE LAGOON, THE SECONDARY CONTAINMENT AREA AND THE WATER LEVELS AT THE RETAINING WALL.
- C. EPA/CRES NEGOTIATIONS TO CONTINUE WITH STEERING COMMITTEE REGARDING CONSENT AGREEMENT. DECISION EXPECTED WEEK OF 5/22/89.

DOUGLAS FOX, OSC
EPA REGION III
PHILADELPHIA, PA

AR100138

ORIGINAL
(ad)

POLREP #40
METRO CONTAINER CERCLA REMOVAL PROJECT
TRAINER, DELAWARE COUNTY, PA
ATTN: CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (1800 HOURS, 6/5/89)

A. OSC INFORMED BY CRES/WOLPER THAT PRP STEERING COMMITTEE HAS SIGNED CONSENT AGREEMENT AND HAS TAKEN OVER CLEANUP OPERATIONS.

B. ESTIMATED COSTS TO DATE (COB 6/5/89):

	EST COST TO DATE	CEILING
EPA	\$ 9,000	\$ 16,500
EPA INDIRECT	15,000	30,000
TAT	43,000	50,000
MINI-ERCS	250,000	594,000
	-----	-----
TOTAL	\$ 317,000	\$ 690,500

II. ACTIONS TAKEN:

A. TAT CONTINUED TO MONITOR LEVELS IN LAGOON AND SECONDARY CONTAINMENT AFTER PERIODS OF RAINFALL. NO APPRECIABLE INCREASES WERE DETECTED.

B. TAT ALSO DRAINED 2 INCHES OF WATER FROM THE RETAINING WALL AREA ON 5/26/89. AN OIL SHEEN WAS NOTED ON THIS WATER, SO DRAINAGE WAS DISCONTINUED AT THIS POINT.

C. ON 6/2/89, CRES/WOLPER INFORMED THE OSC THAT THE PRP STEERING COMMITTEE HAD SIGNED THE CONSENT AGREEMENT TO TAKE OVER CLEANUP OPERATIONS FROM EPA. THE PRP'S DELIVERED THE SIGNED AGREEMENT ALONG WITH KEYS TO NEW LOCKS INSTALLED ON THE GATES.

III. FUTURE PLANS

A. PRP'S TO DELIVER FINALIZED WORKPLAN FOR CLEANUP ACTIVITIES WEEK OF 6/12/89.

B. EPA/WESTERN RESPONSE ROLE ANTICIPATED TO BE REVIEW OF PRP WORKPLAN AND MONITORING OF PRP ACTIVITIES ON SITE.

C. NO ADDITIONAL CLEAN UP OPERATIONS BY EPA EXPECTED.

DOUGLAS FOX, OSC
EPA REGION III
PHILADELPHIA, PA

AR100139

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: C.KLEEMAN (EPA9340)
To: D.FOX (EPA9344)
From: D.FOX (EPA9344) Delivered: Tue 19-Dec-89 9:31 EST Sys
163 (50)
Subject: metro polrep 41
Mail Id: IPM-163-891219-085760405

POLREP 41
METRO CONTAINER SITE
TRAINER, DELAWARE COUNTY, PENNSYLVANIA
ATTN: CHARLES KLEEMAN AND TIM FIELDS

I. SITUATION (MONDAY, 12/18/89, 0900 HOURS)

A. SINCE THE PRP STEERING COMMITTEE ASSUMED RESPONSIBILITY FOR THE CLEANUP AT THE SITE ON JUNE 2, 1989, THE OSC HAS BEEN PERIODICALLY ASSESSING THE PROGRESS BEING MADE. ALL DRUMS HAD BEEN REMOVED FROM THE SITE AND THE WASTE LAGOON WAS EMPTIED AND DECOMMISSIONED DURING THE PRP CLEANUP. THE RECLAMATION BUILDING HAS BEEN CLEANED OF CONTAMINATION AND WAS BOARDED UP. ON SITE TANKS WERE EMPTIED AND REMOVED. A SURFACE SCRAPE OF THE TOP SOIL WAS RECENTLY COMPLETED. THE OSC TASKED TAT TO WITNESS AND DOCUMENT SOIL SAMPLING ACTIVITIES ON 12/12/89, WHICH WAS THE LAST ITEM TO BE COMPLETED UNDER THE CONSENT AGREEMENT BETWEEN THE PRP STEERING COMMITTEE AND EPA.

B. PERSONNEL ON SCENE 12/12/89:

EPA-1

TAT-2

PRP CONTRACTOR-2

C. ESTIMATED COSTS TO DATE (COB 12/12/89):

	COSTS	CEILING
EPA DIRECT	\$ 9,000	\$ 16,500
EPA INDIRECT	15,000	30,000
TAT	43,000	50,000
MINI-ERCS	250,000	594,000
	-----	-----
TOTAL	317,000	690,500

II. ACTIONS TAKEN

A. TAT ARRIVED ON SITE AT 1000 HOURS, 12/12/89. ENFORCEMENT/KHO WAS ALSO ON SCENE. TAT WITNESSED THE SOIL SAMPLING PERFORMED BY THE PRP CONTRACTOR. NINE SURFACE SOIL AND THREE CORE SAMPLES WERE TAKEN FROM VARIOUS LOCATIONS AROUND THE SITE. TAT NOTED A FENCE AROUND THE RECLAMATION BUILDING WAS BEING INSTALLED TO PREVENT UNAUTHORIZED ENTRY. TAT PHOTODOCUMENTED THE SAMPLING ACTIVITIES AND THE SITE. TAT DEPARTED THE SITE 1300 HOURS.

III. FUTURE PLANS

A. SOIL SAMPLING RESULTS FROM 12/12/89 TO BE REVIEWED BY OSC AND TAT. HIGH LEVELS OF CONTAMINATION ARE NOT EXPECTED SINCE SOIL SAMPLING DURING REMOVAL ACTIONS REVEALED ONLY LOW LEVELS OF CONTAMINATION IN SURFACE SOIL.

B. DUE TO THE COMPLETENESS OF THE PRP CLEANUP AND THE INVOLVEMENT OF ENFORCEMENT IN THE LAST PHASE OF THE CLEANUP, THE OSC ANTICIPATES NO FURTHER ACTION AT THE SITE.

C. OSC REPORT IN PREPARATION.

DOUGLAS P. FOX, OSC
EPA REGION III
PHILADELPHIA, PA

AR100140



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

DELIVERY ORDER FOR EMERGENCY RESPONSE CLEANUP SERVICES

(This delivery order is issued subject to all terms and conditions of the contract identified in Block 2.)

1. DATE OF ORDER 9/16/88	2. CONTRACT NUMBER 68-W8-0030	3. ORDER NUMBER 0030-03-								
4. TIME OF INITIAL ORDER (If initial order was verbal) (Specify Time Zone) 3:30 PM	5. DELIVERY ORDER CEILING AMOUNT (Obligated Amount) \$135,000.00									
6. ACCOUNTING AND APPROPRIATION DATA										
<table border="1"><tr><td>Appropriation Number</td><td>Document Control No.</td><td>Account Number</td><td>Object Class</td></tr><tr><td>68/20X8145</td><td>RVO134</td><td>8TFA3ASE2H</td><td>2535</td></tr></table>			Appropriation Number	Document Control No.	Account Number	Object Class	68/20X8145	RVO134	8TFA3ASE2H	2535
Appropriation Number	Document Control No.	Account Number	Object Class							
68/20X8145	RVO134	8TFA3ASE2H	2535							
7a. ISSUED TO: CONTRACTOR (Name, Address, and ZIP Code) Guardian Environmental Services 1280 Porter Road Bear, De 19701		8a. ISSUED BY: ORDERING OFFICE (Name, Address, and ZIP Code) EPA Region III 3HW22 Emergency Response & Preparedness 841 Chestnut St Philadelphia, PA 19107								
7b. PROGRAM MANAGER (Name and Phone Number) Bob Caron (302) 834-1000		8b. EPA REGION/USCG DISTRICT EPA III								
7c. RESPONSE MANAGER (Name and Phone Number) JACK Wilson		8c. ZONE N/A								
9. RESPONSE LOCATION (Site Name and/or Address and ZIP Code) Metro Container 2nd & Price Streets Trainer, PA 19013		8d. ON-SCENE COORDINATOR (Name and Phone Number) Lynn Wilber (215) 597-2711								
10. CONTRACTOR REQUIRED ON SITE (Date and Time) (Specify Time Zone) 9/19/88 8:00 AM		11. REQUIRED WORK COMPLETION DATE 10/31/88								

12. STATEMENT OF WORK The Contractor shall furnish the necessary personnel, materials, services, facilities, and otherwise do all things necessary for or incident to the performance of the work set forth below: <ul style="list-style-type: none">- The contractor shall provide all personnel & equipment required to excavate, stage, sample (soils, water, waste) and arrange for disposal of contaminated soils, sludge, and groundwater.- Supply security services as scheduled by the OSC.- Arrange for analytical services, transportation & disposal of wastes specified by the OSC.- provide fencing to restrict access to the site- perform grading & berming to control run off and erosion- perform restoration upon completion of removal activities as directed by the OSC.

13. ORDERING OFFICER		AR100141
NAME/TITLE Stephen Inzuela, OSC Chief Emergency Response Section	SIGNATURE 	DATE 9/16/88



53 Haddonfield Road, Cherry Hill, NJ 08002 • (609) 482-0222

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-7367

TO: Doug Fox, OSC, Region III PCS #1478
THRU: Terry Briggs, TATL, Region III TDD #8712-08
FROM: Lynn Wilder, TAT, Region III
SUBJECT: Metro Container, CERCLA Removal Response
Delaware County, Trainer, PA
DATE: December 21, 1987

INTRODUCTION

On December 11, 1987, at 1330 hrs, EPA Region III's Emergency Response Section was notified by EPA Enforcement Stauteville of a possible emergency situation at the Metro Container Corporation located in Delaware County, Trainer, PA. Notified by the Pennsylvania Department of Environmental Resources of a potentially hazardous situation, EPA Enforcement had performed a visual site inspection of this active drum recycling/reclaiming facility in the morning of 12/11/87. Enforcement was concerned over leaking drums containing sludge from the facility's drum cleaning process and requested that the EPA Emergency Response Section inspect the site.

BACKGROUND

The Metro Container facility is an active drum recycling/reclaiming facility located in Delaware County, Trainer, PA. In operation for approximately 20 years, the facility has gone through several ownerships. For the past 1 1/2 years, it has been known as Metro Container. The facility accepts RCRA "empty" drums, cleans and sells them. Wastes from the drum cleaning process are either incinerated on site or routed through an on-site sludge treatment process. The incinerated ash is shipped to an off-site disposal facility. Through an agreement with the local sewer authority, Metro Container had been disposing of their treated sludge liquids through the local sewage system. The remaining sludge was sent for disposal at the Sumptor Landfill in Sumptor, Michigan.

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Metro Container, CERCLA Removal Response
December 21, 1987
Page Two

Metro Container currently houses approximately 60,000 unreclaimed drums at their facility. The facility's sludge treatment system became nonfunctional approximately six months ago, resulting in a buildup of untreated sludge. This sludge was stored onsite in open lagoons and in unsecured drums that were sent to the facility for reclamation. Unable to handle this sludge buildup, the company decreased their reclaiming processes by half in early November of this year. All sludges generated since that time have been sent for disposal at the Sumptor Landfill. The facility has been financially unable to dispose of the sludge buildup acquired before the decrease in production.

The facility formerly operated on a 24-hour basis, five days a week. The company has no formal security personnel, and the facility property is not completely fenced. Metro Container is located in an industrial area, with oil refineries to the East and West, railroad lines and the Delaware to the South, and the residents of Trainer Borough to the Northwest (refer to site map). Stoney Creek, a tributary to the Delaware River, borders the western edge of the facility property. Under the direction of PADER, a runoff pipe from the facility into the creek was blocked approximately 1 1/2 years ago.

Unable to handle the buildup of waste sludge and unable to continue full-scale operations, the Metro Container Corporation filed for bankruptcy (Chapter 11) on December 7, 1987. The company has recently requested a loan to acquire a new sludge filtration system and to continue shipping untreated sludge to Michigan. Until this loan is approved, Metro Container will be closed (as of 12/12/87). Company officials foresee operations beginning again in mid January.

EMERGENCY ASSESSMENT ACTIVITIES

Upon arrival on scene (from 1510 to 1575 hrs.) OSCs Fox and Jackson, Enforcement Stauteville, and TAT member Wilder met with Metro Container representatives Levy (President) and Chairman of the Board (Mazlo) to discuss the facility history and current status. Levy and Mazlo explained the facility's current predicament (refer to Background section of this report) and expressed concern over having EPA involved in any cleanup action before the company could address the situation. Both representatives are concerned over possible public relation problems that could be created by an EPA action. When ask if Trainer Borough residents had expressed concern over facility operations, Mazlo stated that Borough representatives had recently visited the facility, accompanied by PADER representative, Brian Boyd.

Following the meeting, company representative Butler accompanied OSCs, Enforcement, and TAT in a site walk-through (1530 -1615 hrs.). TAT air monitoring indicated no organic readings above background in the areas of sludge storage (open drums and lagoons) or in areas of leaking or spilled sludge material. The waste sludge material appeared to be an oily substance, and was stored in an open cement lagoon (approximately 1300 gallons) and in an estimated 500-1000 55-gallon unsecured drums. According to company representative Butler, the drums that store this material had not been

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Metro Container, CERCLA Removal Response
December 21, 1987
Page Three

reclaimed prior to sludge addition. Many were in poor condition, and many were uncovered and appeared partially filled with rainwater. Although these drums were not observed to be leaking, considerable sludge was present on the ground around the sludge storage drums. This material did not appear to be migrating off site at the time of inspection.

Approximately 60,000 unreclaimed drums are currently stored on the facility property. All drums are stored according to drum type in piles throughout the facility grounds. An HNU reading of approximately 300 units was detected over the open bung of a 55-gallon drum labelled "toluene." In addition to these drum piles, approximately 10-15 trailers were on-site that contained RCRA "empty" drums. According to Butler, these trailers were owned by various companies. All reclaimed (cleaned) drums are stored in the treatment plant until they are sold.

From 1630 to 1724 hours, the TAT sampled at seven locations on the site. Samples collected are as follows:

- (S01) Ash pile south of treatment plant
- (S02) Liquid/Sludge in containment area, west of hydrochloric acid storage tanks.
- (S03) Liquid from Stoney Creek at former discharge pipe.
- (S04) Sludge from leaking sludge drums to east of concrete sludge lagoon
- (S05) Sludge in concrete lagoon
- (S06) Sludge in uncovered 55-gallon drum (south of concrete lagoon)
- (S07) Sludge in uncovered 55-gallon drum (east of concrete lagoon).

Enforcement Steuteville informed company representative Levy that he would be given splits of all samples collected. Levy stated that this would not be necessary. OSC Jackson accompanied the TAT during sampling. All sampling was performed in Level "C" protection, with sampling location air monitoring (HNU) performed. No organic vapors were detected above background during sampling.

While the TAT was sampling OSC Fox and Enforcement discussed their assessment observations with Levy and Mazlo. OSC Fox informed these representatives that if analytical results indicated contamination problems, an EPA removal action may be necessary. The OSC also voiced his concern over the collection of oily waste materials that could easily migrate off site into Stoney Creek.

All personnel were off site at 1800 hours. TAT sent samples collected to York Laboratories (Whippany, NJ) on 12/14/87. Samples were analyzed under TAT Special Projects for RCRA analysis (ash sample), full priority pollutant analysis (sludge samples), and priority pollutant metals (stream sample). Verbal results were to be available by 12/18/87, and written results by 12/25/87.

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Metro Container, CERCLA Removal Response
December 21, 1987
Page Four

ANALYTICAL RESULTS

Table 1 and the attached site sketch summarize the sampling points and the analytical results of samples taken 12/12/87. None of the results are above EPA Action Levels for drums or soil. However, contaminants present may have been diluted by rain water. The drums and lagoons sampled were uncovered, and the areas of leaking sludge (on the ground) contained large portions of water.

In addition, data from PADER sampling (earlier in 1986) revealed low levels of groundwater contamination in monitoring wells 5 & 6.

CONCLUSIONS/RECOMMENDATIONS

Based upon State and TAT analytical data, and from a visible inspection of site conditions, the following may become problems at the facility:

- (1) Uncontrolled access to the site may lead to vandalism and/or human exposure and injury.
- (2) Since site operations have temporarily ceased (Chapter 11) and no security system is in place, the possibility of vandalism or arson exists.
- (3) Poor housekeeping of the sludge waste material may lead to further groundwater contamination and off-site migration of contaminants into Stoney Creek.
- (4) A complete site investigation was not possible during the EPA/TAT response; therefore, areas of concern may have been missed.
- (5) Although analytical results indicate no concentrations above EPA Action Levels, contents of drums undiluted by rain may have much higher contaminant levels.

In conclusion, TAT recommends that a more extensive assessment be performed before any possible site actions, if any, are made. Areas not previously investigated will be assessed, with the possibility of performing additional sampling. Based on an additional assessment, recommendations will be made to the OSC.

Attachments: Roster of Agencies
Analytical Result Summary Table
Site Sketch/Sampling Location Map
Topographic Map
Area Map
Polrep
Photographs
QA/QC

AR100145

Metro Container, CERCLA Removal Response
December 21, 1987
Page Six

ORIGINAL
(Red)

Roster of Agencies

Name	Contact	Position/Duties
U.S. EPA, Region III 841 Chestnut Bldg Philadelphia, PA 19107 (215) 597-1389	Doug Fox Alan Jackson	On Scene Coordinator Jr. On-Scene Coordinator
U.S. EPA, Region III 841 Chestnut Bldg Philadelphia, PA 19107 (215) 597-6678	Bill Steuteville	Enforcement
Pennsylvania Dept. of Environmental Resources Ridley Creek State Park East Sycamore Mills Rd Media, PA 19063 (215) 565-1687	Brian Boyd	State Representative
Roy F. Weston, Inc. Region III Technical Assistance Team 53 Haddonfield Rd, Suite 306 Cherry Hill, NJ 08002 (609) 482-0222	Lynn Wilder John Disciullo Stephanie Morris	Assessment Lead
Metro Container Corporation W. Second St. & Price Rd Trainer, PA (215) 485-6100	Sidney Levy	President

AR100146

Table 1-Metro Container, Emergency Assessment Sampling ResultsSample S01- Ash pile south of Treatment Plant

<u>Metals</u>	<u>Concentration (ppm)</u>
Barium	2.47
Cadmium	0.91
Chromium	0.49
Lead	19.00
Pesticides/herbicides	Less than detection limits
Corrosivity (pH)	8.55
Ignitable	No
Reactive-HCN	No
H2S	No

Sample S02- Liquid/sludge, east of hydrochloric acid tanks

<u>Metals</u>	<u>Concentration (ppm)</u>
Copper	16.18
Lead	82.70
Zinc	88.50
Cyanide	1.36
Total Phenolics	6.76
<u>Volatiles</u>	<u>Concentration (ppb)</u>
Methylene Chloride	12,000
1,2-dichloroethane	37,000
1,1,1-trichloroethane	35,000
Carbon tetrachloride	5,300
Trichloroethylene	7,700
Tetrachloroethylene	6,600
Toluene	93,000
<u>Base Neutrals</u>	
1,2-dichlorobenzene	18,000
naphthalene	120,000
di-n-butyl phthalate	94,000
butyl benzyl phthalate	140,000
bis (2-ethyl hexy) phthalate	660,000
Acid Extractables	Not detected
Pesticides/PCB's	Not detected

AR100147

ORIGINAL
(Red)

Table 1 cont'd

Sample S03- Liquid, former discharge point into Stoney Creek

	<u>Concentration (ppm)</u>
Metals	Not detected
Cyanide	Not tested
Total phenolics	Not tested
Volatiles and base neutrals	Not tested
Acid Extractables	Not tested
Pesticides/PCB's	Not tested

Sample S04- Sludge-leaking drum area east of lagoon

<u>Metals</u>	<u>Concentration (ppm)</u>
	Not detected
<u>Volatile organics</u>	<u>Concentration (ppb)</u>
Methylene Chloride	270
Toluene	3
2-propanone (tentative)	22
<u>Base Neutrals</u>	
bis (2-ethyl hexyl) phthalate	970
Acid Extractables	Not detected
Pesticides/PCB's	Not detected

AR100148

ORIGINAL
(Red)

Table 1-cont'd

***Sample S05- Sludge, cement lagoon**

<u>Metals</u>	<u>Concentration (ppm)</u>
Cadmium	7.18
Chromium	51.80
Copper	31.30
Lead	319.00
Mercury	0.20
Nickel	9.60
Zinc	228.00
Cyanide	2.02
Total phenolics	13.90

<u>Volatile organics</u>	<u>Concentration (ppb)</u>
Methylene chloride	8,500
1,2-dichloroethane	5,100
1,1,1-trichloroethane	19,000
Carbon tetrachloride	2,100
Trichloroethylene	4,300
Tetrachloroethylene	22,000
Toluene	180,000

<u>Base Neutrals</u>	
1,2-dichlorobenzene	67,000
naphthalene	98,000
di-n-butyl phthalate	150,000
bis(2-ethyl hexyl) phthalate	850,000

<u>Acid Extractables</u>	
Phenol	29,000

Pesticides/PCB's Not detected

*Note: This sample is currently being tested for flashpoint

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Table 1-cont'd

*Sample S06- Drum sludge, south of lagoon

<u>Metals</u>	<u>Concentration (ppm)</u>
Arsenic	0.93
Cadmium	3.57
Chromium	24.30
Copper	36.50
Lead	345.00
Mercury	0.63
Nickel	11.20
Zinc	549.00

Cyanide	37.40
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Total phenolics	14.50
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<u>Volatile organics</u>	<u>Concentration (ppb)</u>
Methylene chloride	1,300
1,2-dichloroethane	1,900
1,1,1-trichloroethane	470
Trichloroethylene	320
Tetrachloroethylene	410
Toluene	9,500
Ethyl benzene	2,000

<u>Base Neutrals</u>	
Naphthalene	48,000
di-n-butyl phthalate	52,000

Acid Extractables	Not detected
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Pesticides/PCB's	Not detected
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AR100150

Table 1-cont'd

*Sample S07- Drum sludge, east of lagoon

<u>Metals</u>	<u>Concentration (ppm)</u>
Copper	1.83
Lead	7.70
Mercury	0.06
Zinc	6.72
Cyanide	2.21
Total phenolics	12.00
<u>Volatile organics</u>	<u>Concentration (ppb)</u>
Methylene chloride	1,600
1,2-dichloroethane	1,900
1,1,1-trichloroethane	540
Trichloroethylene	200
Tetrachloroethylene	190
Toluene	6,900
Ethyl benzene	860
Butane (tentative)	1,100
<u>Base Neutrals</u>	
1,2-dichlorobenzene	79
Isophorone	5,100
Naphthalene	1,100
di-n-butyl phthalate	330
bis (2-ethyl hexyl) phthalate	1,400
<u>Acid Extractables</u>	
Phenol	17,000
2,4-dimethylphenol	830
Pesticides/PCB's	Not detected

AR100151

Table 1-cont'd

*Sample S07- Drum sludge, east of lagoon

<u>Metals</u>	<u>Concentration (ppm)</u>
Copper	1.83
Lead	7.70
Mercury	0.06
Zinc	6.72
Cyanide	2.21
Total phenolics	12.00
<u>Volatile organics</u>	<u>Concentration (ppb)</u>
Methylene chloride	1,600
1,2-dichloroethane	1,900
1,1,1-trichloroethane	540
Trichloroethylene	200
Tetrachloroethylene	190
Toluene	6,900
Ethyl benzene	860
Butane (tentative)	1,100
<u>Base Neutrals</u>	
1,2-dichlorobenzene	79
Isophorone	5,100
Naphthalene	1,100
di-n-butyl phthalate	330
bis (2-ethyl hexyl) phthalate	1,400
<u>Acid Extractables</u>	
Phenol	17,000
2,4-dimethylphenol	830
Pesticides/PCB's	Not detected

AR100152

Table 2

Pennsylvania Department of Environmental Resources Findings at
Metro Container Corporation Site, Sampled On 15 January, 1987.

I. Soil

Stoney Creek Discharge	Phenol	40 PPB
	Xylenes	50 PPB
	Cumenes	60 PPB

Concrete Berm Area	Iron (tot)	38700 PPB
	Lead (tot)	476 PPB
	Zinc (tot)	291 PPB

Lagoon Area	Xylenes	8000 PPB
	Cumenes	35000 PPB
	Styrene	10000 PPB
	Dichloro Benzene	5000 PPB

II. Groundwater

Well 5	Phenol	80 PPB
	Cresols	30 PPB
	Carbon disulfide	detected

Well 6	Phenols	32 PPB
	Cresols	8 PPB

AR100153

ORIGINAL
(Red)



53 Haddonfield Road, Cherry Hill, NJ 08002 • (609) 482-0222

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-7367

MEMORANDUM

TO: Doug Fox, OSC, Region III PCS: 1536
THRU: Terry Briggs, TATL, Region III ¹³ TDD: 8712-08A
FROM: Lynn Wilder, TAT, Region III *fw*
SUBJECT: Metro Container, Offsite Migration Assessment
Delaware County, Trainer, PA
DATE: March 20, 1988

INTRODUCTION

On February 18, 1988, On-Scene Coordinator (OSC) Fox requested the Technical Assistance Team (TAT) to perform a second assessment at the Metro Container facility located in Delaware County, Trainer, Pennsylvania. OSC Fox had been notified by the U.S. Coast Guard (USCG) of Gloucester City, NJ, that on Friday, February 12, 1988, the USCG had responded to a spill report and had traced the release to the Metro Container facility. The USCG reported that an oily substance was running off the Metro Container facility and entering Stoney Creek and ultimately, the Delaware River. The spill had been called in by a facility down river from the Metro facility when they had observed the material on the Delaware River. The OSC requested TAT to prepare for sampling for offsite migration documentation the following day (February 19, 1988).

BACKGROUND

EPA and TAT had conducted an emergency assessment of the Metro Container drum recycling/reclaiming facility on December 11, 1987. On scene were EPA OSC's Fox and Jackson, EPA Enforcement Steuteville, and TAT members Wilder, Discuillo, and Morris. Before the visual inspection of the facility and sampling, EPA and TAT met with Metro Container representatives Levy (President) and Mazlo (Chairman of the Board). The company representatives explained that the facility's sludge treatment system had become inoperable approximately "six months ago" (mid May, 1987), and had resulted in a buildup of untreated sludge at their facility from their drum reclaiming process.

Roy F. Weston, Inc.

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION

In Association with ICF Technology Inc., Johnson & Associates, Inc., and Applications, Inc.

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Metro Container, Offsite Migration Assessment
March 20, 1988
Page 2

Previous to the sludge treatment system's breakdown, the treated sludge liquids had been disposed of through the local sewage system. The remaining sludge was sent for disposal at the Sumptor Landfill in Sumptor Michigan. When the system became nonfunctional, the untreated sludge was stored onsite in open lagoons and in unsecured drums that were sent to the facility for reclamation. Unable to handle this sludge buildup, the company decreased their reclamation processes by half in early November, 1987. All sludges generated since the decreased operations were sent for disposal at the Sumptor Landfill. The facility was financially unable to dispose of the sludge acquired before the decrease in production.

Metro Container also treats wastes from their cleaning processes by incineration. The incinerated ash is also sent to Sumptor Landfill for disposal.

Unable to handle the buildup of waste sludge and unable to continue full-scale operations, the Metro Container Corporation filed for bankruptcy (Chapter 11) on December 7, 1987. The company hoped to obtain a loan to acquire a new sludge filtration system and to ship the buildup of untreated sludge to Michigan. Until the loan approval, Metro Container was to have been unoperational as of December 12, 1987. Company officials foresaw restarting operations in mid January, 1988.

Following the meeting, company representative Butler accompanied OSC's, Enforcement, and TAT in a site walk-through and sampling. Refer to the attached 12/21/87 Trip Report for further assessment detail.

Results of TAT's initial sampling showed numerous organic and inorganic contaminants present in the facility's waste. The ash sample showed an EP toxicity lead concentration of 19 ppm (above the RCRA "action level" of 5 ppm). All other concentrations were below EPA Emergency Action Levels for drums or soil.

Based on the analytical results and the company's possible operational restart, OSC Fox referred the site to EPA Region III's RCRA Section. RCRA personnel performed a site assessment in early January, 1988. TAT sampling points were duplicated and sent to Central Regional Laboratories (CRL) for EP toxicity analysis. Except for the ash sample, no EP toxicity analysis had been performed on samples taken by TAT in December. At the time of TAT's second sampling, CRL had not completed analysis of RCRA samples.

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Metro Container, Offsite Migration Assessment
March 20, 1988
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ASSESSMENT ACTIVITIES

EPA OSC Fox, EPA Enforcement Steuteville, and TAT members Wilder and Morris arrived at the Metro Container facility at 1020 hours on February 19, 1988. USCG representative DiDomenico was present upon EPA arrival. A Pennsylvania Department of Environmental Resources (PADER) was to have been on-scene as well, but did not arrive this date.

The OSC, Enforcement, USCG, and TAT met with Metro Container President (Levy) from 1035 to 1100 hours. OSC Fox informed Levy that any release from a facility should be reported to the National Response Center as soon as possible. Levy was unaware of this protocol and told the OSC that he was unaware of a release until a PADER representative had informed him. During the meeting, Levy contacted the NRC to notify them of the February 12, 1988 release.

OSC Fox asked Levy if any of the ash or untreated sludge that was located at the facility at the previous assessment had been disposed of. Levy indicated that the leaking drums containing sludge are being removed and that the ash continues to be sent for disposal to Sumptor Landfill. Levy also said that "liquid" operations have been shut down since December, 1987.

When asked what operations were occurring on site at the time of the meeting (February 19, 1988), Levy said that the furnace treatment process (thermal neutralization through a drum reclamation process) was still in operation. This process can only be used for "open headed" drums. Drums with bungs could not be reclaimed by this method unless their top metal portion was removed (making them open headed drums). Mr. Levy informed EPA that the furnace reclamation process was in operation under Metro Enterprise Container Corporation; a different company than the sludge treatment process. According to Levy, Metro Enterprise Container Corporation began operations in mid 1986, and is still accepting drums.

Mr. Levy was given a copy of the TAT December 21, 1987 Metro Container Trip Report. The results of TAT December 11, 1987 sampling were explained by Enforcement Steuteville. Steuteville also asked Mr. Levy if he wanted duplicate samples of TAT sampling that date. Mr. Levy declined.

From 1100 to 1130 hours, EPA, USCG, and TAT performed a visual site inspection. The assessment team was accompanied by company representative Jerry Butler.

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March 20, 1988
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The following observations were noted (refer also to attached photographs):

1) Booms in place around December 12, 1988 runoff area (near former discharge point) were not positioned properly to retard future runoff into Stoney Creek. As seen in the attached photographs, untreated sludge waste that had leaked from drums and standing rain water levels approached these booms.

2) Hay bales in place along the bank of Stoney Creek (from former discharge point, upstream) were in a state of deterioration.

3) No active runoff over the banks into Stoney Creek was observed during the assessment; however, signs of past runoff were observed as several points along the creek bank appeared to be eroded.

4) In several locations along Stoney Creek active runoff was occurring that originated from points within the stream bank. Debris that had been pushed over the bank made it impossible to deduce the origin of the runoff (i.e. no piping could be observed). Only one pipe (green PVC) was visible. This pipe was discharging a clear liquid into the creek and was reported to be a permitted rainwater runoff discharge point. Other discharge areas of unknown origin included the following: two areas close to the southern border of the facility property discharging a white material that floated above water and adhered to plants and debris; several areas from the former discharge point and upstream discharging a red-orange material and creating slight sheens when disturbed.

5) Several partially buried drums were noted along the stream bank upstream from the green discharge pipe.

6) An old underground pipe was noted in the stream bank near the former discharge point that was coming from the direction of the cement lagoon.

From 1130 to 1350 hours TAT collected samples from the following locations:

Location	Sample #
Streambank, former discharge point	
-soil, composite	S01
-water, grab	W04
Streambank, white discharge point	
-soil, composite	S02
-water, grab	W05

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Metro Container, Offsite Migration Assessment
March 20, 1988
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Streambank, green discharge pipe
-soil, composite S03
-water, grab W08

Streambank, background
-soil, composite S07
-water, grab W06

During sampling OSC and TAT noted a large spill of sludge material from an overfilled tank on the West side of the facility treatment plant (refer to photographs). Recently dumped gravel was in the area of this spill. The overfill appeared to have recently occurred, as the spilled material was still actively migrating on the ground. The OSC and TAT also noted a large, uncovered pile of ash located in the midst of drums Southwest of the cement lagoon.

At 1530 hours, EPA and TAT personnel departed from the site. Samples were delivered to CSAS laboratories by TAT at approximately 1930 hours. Analysis requested included pH, BNA, PP metals, and cyanide for water samples, and EP toxicity leechate and PP metals for soil samples. Because of the short turn-around time requested (7 days), analysis was performed using TAT Special Projects.

TAT received written results of the 2/19/88 sampling round from CSAS on March 5, 1988. The laboratory failed to perform BNA analysis on all water samples. Therefore, on March 7, 1988, TAT resampled at the same discharge points and sent water samples to Gulf Coast Laboratories (University Park, Illinois) for BNA analysis under TAT Special Projects. TAT was charged only for analyses performed by CSAS.

ANALYTICAL RESULTS

The attached data are the results of the 2/19/88 and 3/7/88 sampling. All results have undergone TAT QA/QC review and are accepted. E.P. Toxicity data show no concentrations above RCRA "action levels" in the soil samples taken. Several soil samples' results indicate high levels of lead, chromium and zinc in the P.P. Metals analysis. Water analyses indicate no metal contamination, close to neutral pH's, little to no cyanide, and detection of very few BNA's above detection limits. The white discharge point (S03, 3/7/88) detected a phenol concentration of 240 ug/L.

Metro Container, Offsite Migration Assessment
March 20, 1988
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CONCLUSIONS/RECOMMENDATIONS

Based on preliminary analytical results, levels of contaminants migrating off-site appear to be below levels to which the EPA Removal Response and Emergency Response Preparedness Sections can address. It is recommended that PADER RCRA personnel inspect the site for possible violations.

As in the previous report from the TAT, the following areas may become problems at the facility:

- (1) Uncontrolled access to the site may lead to vandalism and/or human exposure and injury.
- (2) Poor housekeeping of the sludge waste material may lead to further groundwater contamination and to off-site migration into Stoney Creek during heavy rains.
- (3) Possible violations pertaining to storage of untreated sludge and ash on site.

In conclusion, TAT recommends that since a portion of the facility is still active (Metro Enterprise Corporation), that RCRA personnel assess the facility for poor housekeeping violations.

Attachments: Roster of Agencies
Site Sketch/Sampling Location Map
Topographic Map
Photographs
Analytical Results

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Metro Container, Offsite Migration Assessment
March 20, 1988
Page 7

ROSTER OF AGENCIES

Name	Contact	Position/Duties
U.S. EPA, Region III 841 Chestnut Bldg Philadelphia, PA (215) 597-1389	Doug Fox	On-Scene Coordinator
U.S. EPA, Region III 841 Chestnut Bldg Philadelphia, PA (215) 597-6678	Bill Steuteville	Enforcement
USCG Glouster City, NJ (609) 456-1370	Larry DiDomenico	Pollution Investigator
Roy F. Weston 53 Haddonfield Rd Cherry Hill, NJ (609) 482-0222	Lynn Wilder Stephanie Morris	Technical Assistance Team

AR100160



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

Date: April 7, 1988

To: Mr. Charles J. Walters
Public Health Advisor
EPA Region III

From: Robert Caron
Section Chief
EPA Region III

Subject: Metro Container Corporation
Delaware County, Trainer, PA

I. Identifying Information

Site Name: Metro Container Corporation/Metro Enterprise Corporation

Site address: On Price St. in Trainer, Delaware County, PA.

Site type: A drum recycling/reclaiming facility, with large numbers of sludge filled drums and a lagoon.

Contact person to call if On-Scene Coordinator not available: John Fellingner, Technical Assistance Team, Region III, (609) 482-0222.

Background: The EPA and TAT conducted an emergency assessment of the Metro Container Drum recycling/reclaiming facility on December 11, 1987. The facility accepts RCRA empty drums, cleans and sells them. Wastes from this process are incinerated on-site (Metro Enterprise) or routed through an on-site sludge treatment process (Metro Container). The incinerated ash is shipped to an off-site disposal facility. Through an agreement with the local sewer authority, Metro container has been disposing of their treated sludge liquids through the local sewage system. The remaining sludge was sent for disposal at the Sumptor Landfill in Sumptor, Michigan. The facility's sludge treatment system became inoperable in June of 1987, resulting in a build-up of untreated sludge. This sludge was stored onsite in an open lagoon and in unsecured drums. Unable to handle this sludge build-up, the company decreased their reclaiming process

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by half in early November, 1987. All sludges generated since that time have been sent to the Sumptor Landfill. The company has been financially unable to dispose of the sludge accumulated prior to November, 1987.

Results of the TAT original sampling showed numerous organic and inorganic contaminants to be present in the facility's wastes. The facility's incineration ash pile was found to have EP Toxicity lead concentration of 19 PPM (above the RCRA "action level" of 5 PPM). Based on the analytical results and the company's possible operational restart, OSC Fox referred the site to EPA Region III's RCRA Section. RCRA personnel performed a site assessment in early January, 1988, duplicating the original TAT sampling, and sent all samples for RCRA analysis. At the time of this report, the results of the RCRA assessment are not available.

OSC Fox received notification of a release of an oily substance on 12 February, 1988 which entered Stoney Creek and ultimately, the Delaware River. On February 18, 1988, OSC Fox directed the Technical Assistance Team to perform a second assessment at Metro Container. TAT sampling for offsite migration was performed on February 19, 1988. The cause of the discharge was found to be the uncontrolled run-off of sludge from the deteriorating drums staged in the lagoon area.

Specific Concerns: Threat posed by the high concentrations of E.P. Toxic lead found in the incinerator ash pile, the general uncontrolled nature of wastes onsite, uncontrolled site access, and offsite migration.

II. Substances Present

500 to 1000 badly deteriorated leaking containers holding sludge are staged on the site, the 1300 gallon lagoon is completely sludge filled, with its' containment wall partially filled. Heavy rainfall causes the sludge leaking from the drums to overflow into Stoney Creek and increases the chances for the lagoon to overflow.

The enclosed site maps and tables display sampling locations and analytical results of soil and water samples taken on 11 December, 1987 and 19 February, 1988 (TAT). As displayed in the attachments, a lead concentration of 19 PPM, E.P Toxicity Leachate, was found in the ash pile, during the first assessment, which exceeds the RCRA "action level" of 5 PPM. The cement lagoon sample revealed low PPM concentrations of metals, volatile organics, base neutrals, and phenols. The two drum sludge samples showed contaminants present similar to those present in the lagoon. Samples of soil/sludge collected around the areas of leaking drums indicate similar contaminants, although lower in concentration, as found in the deteriorating drums.

Results from the offsite migration soil and water samples indicate no contaminant concentrations above RCRA "action levels". Several soil samples' results indicate high levels of lead, chromium, and zinc (P.P. analysis). Water analysis

indicated no metal contamination, neutral pH, and very low levels of BNA's and cyanide. The white discharge point (S03, 3/7/88) water indicated a phenol concentration of 240 PPB.

III. Geographic and Demographic Data

As shown in the attached site maps, the site is located on the East side of Trainer, Delaware County, PA, just south of the major residential community of Chester. Residences are located just across Price Street which borders the facility. A fence, breached in several locations, surrounds three sides of the facility. An estimated 900 persons live within 1/4 mile of the facility. The site is approximately 2000 ft. from the Delaware river, and borders Stoney Creek, which flows directly to the Delaware River. There are no hospitals, schools, etc. within 1/4 mile of the facility. See attached photographs for site conditions, proximity to residential areas, and quantity of waste.

A municipal water intake is located on the Delaware river in close proximity to the Stoney Creek outlet, however it is located up river from the Stoney Creek outlet.

IV. Relationship to Nearby Community

A private residential community is located to the west and south of the facility (see attached site sketch and map). There is no significant elevation difference between the residential and facility area. The residents use city-supplied water as their potable water supply. Approximately 20 persons are employed at the facility.

V. Data on Environmental Pathways

The attached sampling plan describes the rationale and possible routes of off-site migration. A summary table is also included which includes the lists of major contaminants found at the points sampled.

Ground Water: In 1987 PADER sampled on-site monitoring wells, and found two wells to be contaminated. These wells were down gradient from the sludge filled lagoon. All local residents are supplied with municipal water sources. Monitoring wells can be seen on the attached site sketch.

Surface Water: Discharges to surface water have been recorded, and discharge points have been sampled (see attached sketch). High levels of phenol (P.P. analysis) were detected migrating offsite at one sampling location (S03, white discharge point).

Soil and Sediment: The ash pile contains significant amounts of E.P. toxic lead, with other onsite soil samples containing less than the E.P. toxic "activation levels" for trace metals. High levels of lead, chromium, and zinc (P.P. metals analysis) were detected migrating offsite at sampling point S03, white discharge point (see attached map and QA/QC summary).

Attachments: Area Map
 Site Sketch/Sampling Map
 Table of Results
 Sampling Plan
 Offsite Migration Sampling Plan
 Photographs
 QA/QC Summary

AR100164

PCS 1536
2/19/88

**SAMPLING PLAN FOR
METRO CONTAINER ASSESSMENT**

Kevin L. Wilder
SITE LEAD SIGNATURE

KEVIN L. WILDER
SITE LEAD NAME

QA/QC OFFICER SIGNATURE

QA/QC OFFICER NAME

AR100165

Sampling Plan- Metro Container Assessment

(1) PROJECT DESCRIPTION

A. Background

The Metro Container Facility is an active drum recycling/reclaiming facility located in Delaware County, Trainer, PA. In operation for approximately 20 years, the facility has gone through several ownerships. For the past 1 1/2 years, it has been known as Metro Container. The facility accepts RCRA "empty" drums, cleans and sells them. Wastes from the drum cleaning process are either incinerated on site or routed through an on-site sludge treatment process. The incinerated ash is shipped to an off-site disposal facility. Through an agreement with the local sewer authority, Metro Container had been disposing of their treated sludge liquids through the local sewage system. The remaining sludge was sent for disposal at the Sumptor Landfill in Sumptor, Michigan.

Metro Container currently houses approximately 60,000 unreclaimed drums. The facility's sludge treatment system became nonfunctional 8 months ago, resulting in a buildup of untreated sludge. This sludge was stored on site in open lagoons and in unsecured drums that were sent to the facility for reclamation. Unable to handle this sludge buildup, the company decreased their reclaiming processes by half in November, 1987. All sludges generated since that time have been sent for disposal at the Sumptor Landfill. The facility has been financially unable to dispose of the sludge buildup acquired before the decrease in production.

The company has no formal security personnel, and the facility property is not completely fenced. Metro Container is located in an industrial area, with oil refineries to the East and West, railroad lines and the Delaware River to the South, and the residents of Trainer Borough to the Northwest (refer to site map). Stoney Creek, a tidal tributary to the Delaware River, borders the western edge of the facility property.

Unable to handle the buildup of waste sludge and unable to continue full-scale operations, the Metro Container Corporation filed for bankruptcy (Chapter 11) on December 7, 1987. An EPA Enforcement Lead, EPA's Emergency Removal Section conducted an emergency assessment of the facility on December 11, 1987. Seven locations were sampled (refer to attached analytical results summary). One of the samples (liquid) was collected from Stoney Creek, but was analyzed for PP Metals only.

At the time of the EPA assessment, Metro Container had planned to be back in operation in January of 1988. They are currently unoperational. The OSC referred this site to RCRA, who sampled at various locations at the site in January, 1988. No results have been received to date. On Friday, February 12, 1988

the USCG responded to a release from the facility into Stoney Creek and the Delaware River. The USCG reported that a greenish oily substance was entering the creek from the facility's runoff pipe. The OSC wishes to document and sample for off-site migration on February 19, 1988.

B. Objective

The objective of this assessment is to document off-site migration from the facility. Additional samples may be taken from on-site.

C. Scope

The following is an estimate of the number and location of samples to be taken along with the analysis to be performed:

- 3 stream samples (plus one blank)
 - pH, PP Metals, BNA, and cyanide
- 3 stream area soil samples
 - PP Metals, EP toxicity
- 1 lagoon sample
 - RCRA analysis
- 1 drum
 - RCRA analysis
- 1 soil on site
 - RCRA analysis

D. Data Usage

The data will be used to assess the degree of off-site migration, site contamination, and the potential hazard to the adjacent community. In addition, the data may be used in the development of subsequent immediate removal or remedial actions under CERCLA.

E. Monitoring Network Design and Rationale

Refer to this plan's part C (scope) for number and location of samples to be collected. Because previous sampling and analysis has been performed on-site by EPA's ERS, further sampling on site will be kept to a minimum. Samples will be taken off site to document any possible off site migration, reported to occur during heavy rains. If samples are taken on site, locations sampled will be at the origin of the off-site discharge. The previous sampled lagoon may be resampled for RCRA analysis. Refer to the attached site diagram for previous and potential sampling points.

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F. Monitoring Parameters

The refer to this plan's C (scope) for analyses to be performed. These analyses were selected based upon previous sampling's analytical results.

(2) DATA QUALITY REQUIREMENTS AND ASSESSMENTS

Parameter	Sample Matrix	Det. Limit	Quant. Limit	Est. Acc.	Acc. Protcl	Est. Precisen	Precisen Protcl
-----------	---------------	------------	--------------	-----------	-------------	---------------	-----------------

Det. Limit = Detection Limit
Quant. Limit = Quantitation Limit
Est. Acc. = Estimated Accuracy
Acc. Protcl = Accuracy Protocol
Est. Precisen = Estimated Precision
Precisen Protcl = Precision Protocol

(3) SAMPLING PROCEDURES

A. Equipment

Water, soil, and possibly sludge samples will be taken. Water (stream) and surface soil samples will be taken to document off-site migration. If taken, sludge samples will be a composite to attempt to analyze for all contaminants present at that location (i.e. lagoon, drum, contaminated soil). Lagoons and drums will be sampled with glass drum theives in order to obtain a depth composite sample.

The purpose of the sampling is to document off-site migration of contaminants present at the Metro Container Facility.

B. Sample Handling and Decontamination

The collected sample and its container represent one of the major avenues of personal and environmental exposure. All the precautions are to be taken to ensure that all the samples removed from the site are within the sample container and that no residue remains on the outside of the container. The procedures for collecting samples will be as follows:

(1) Complete logbook entries, sample tags, field record sheets with sample identification point, date, time, and name or initial of team leader.

(2) Type of container used should be described. A ziplock bag should be placed around the outside of the sample container.

(3) Split samples for soil should be mixed in an appropriate pan. The sample shall be stirred vigorously and heaping tablespoonfuls are extracted by sweeping through the material with a spoon.

(4) Where appropriate, "field blanks" will be provided to monitor for possible cross-contamination of samples in the field. In case of high concentrated liquid or soil samples, a field blank is not necessary.

C. Decontamination of Sampling Equipment

To avoid cross contamination and to facilitate sampling, only disposable sampling equipment will be used (scoops and drum thieves). Therefore, other than a change of the sampler's protective outer gloves is required before each new sampling location. All contaminated sampling equipment and protective clothing will remain on-site and will be disposed of along as part of the facility's waste stream.

D. Sample Packaging

A brief description of the sample package will be described as follows:

--Sample container will have sample location number written directly on the container.

--A sampling tag will be attached to each container with the project number, site name, date and time of sample collection, sampler(s)' signature, sample name and location number, type of preservative used (if any), and analysis to be performed.

The samples container shall be placed in a ziplock bag and, when appropriate, placed in a metal paint can containing vermiculite. A chain-of-custody seal will be placed either on the paint can or on the lid of the sample container.

E. Sample Custody Procedure

EPA chain-of-custody forms will be used.

Attachments

Site Location Map

Site Sketch

Previous Sampling Results

Sample Description Sheet

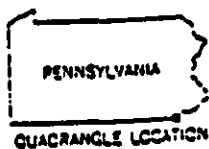
AR100170



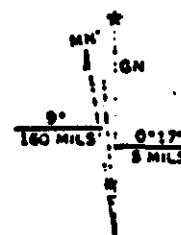
WESTON · SPER

TCO Number:

PCS Number: 1778

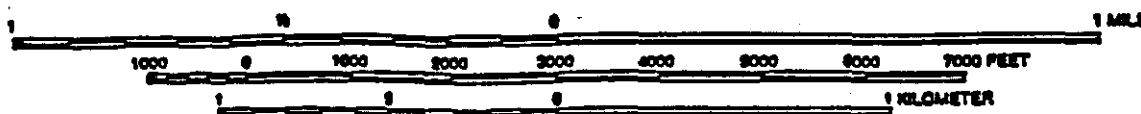


Meteor Container Corporation
Topographic Map
Marcus Hook, PA Quadrangle
12/29/87



UTM GRID AND 1967 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

SCALE 1:24,000



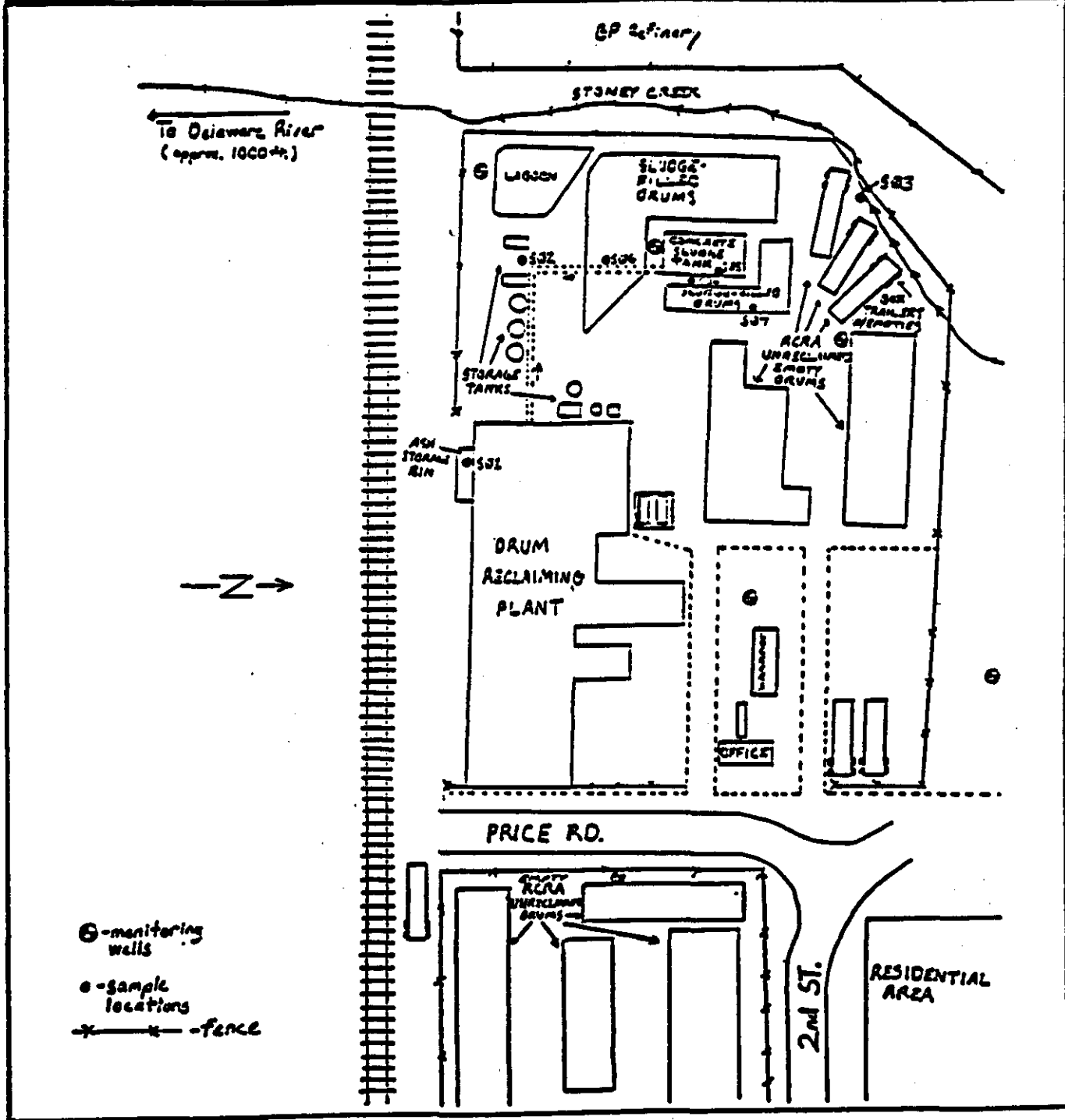
AR100171



WESTON-SPER

TCO Number:

PCS Number: 1778



Metro Container Corporation
Site Sketch
12/29/87

Not to Scale

AR100172

Table 1-Metro Container, Emergency Assessment Sampling Results

Sample S01- Ash pile south of Treatment Plant

<u>Metals</u>	<u>Concentration (ppm)</u>
Barium	2.47
Cadmium	0.91
Chromium	0.49
Lead	19.00
Pesticides/herbicides	Less than detection limits
Corrosivity (pH)	8.55
Ignitable	No
Reactive-HCN	No
H2S	No

Sample S02- Liquid/sludge, east of hydrochloric acid tanks

<u>Metals</u>	<u>Concentration (ppm)</u>
Copper	16.18
Lead	82.70
Zinc	88.50
Cyanide	1.36
Total Phenolics	6.76
<u>Volatiles</u>	<u>Concentration (ppb)</u>
Methylene Chloride	12,000
1,2-dichloroethane	37,000
1,1,1-trichloroethane	35,000
Carbon tetrachloride	5,300
Trichloroethylene	7,700
Tetrachloroethylene	6,600
Toluene	93,000
<u>Base Neutrals</u>	
1,2-dichlorobenzene	18,000
naphthalene	120,000
di-n-butyl phthalate	94,000
butyl benzyl phthalate	140,000
bis (2-ethyl hexy) phthalate	660,000
Acid Extractables	Not detected
Pesticides/PCB's	Not detected

AR100173

Table 1 cont'd

Sample S03- Liquid, former discharge point into Stoney Creek

	<u>Concentration (ppm)</u>
<u>Metals</u>	Not detected
Cyanide	Not tested
Total phenolics	Not tested
Volatiles and base neutrals	Not tested
Acid Extractables	Not tested
Pesticides/PCB's	Not tested

Sample S04- Sludge-leaking drum area east of lagoon

	<u>Concentration (ppm)</u>
<u>Metals</u>	Not detected

	<u>Concentration (ppb)</u>
<u>Volatile organics</u>	
Methylene Chloride	270
Toluene	3
2-propanone (tentative)	22

Base Neutrals

bis (2-ethyl hexyl) phthalate	970
Acid Extractables	Not detected
Pesticides/PCB's	Not detected

AR100174

Table 1-cont'd

*Sample S05- Sludge, cement lagoon

<u>Metals</u>	<u>Concentration (ppm)</u>
Cadmium	7.18
Chromium	51.80
Copper	31.30
Lead	319.00
Mercury	0.20
Nickel	9.60
Zinc	228.00

Cyanide 2.02

Total phenolics 13.90

<u>Volatile organics</u>	<u>Concentration (ppb)</u>
Methylene chloride	8,500
1,2-dichloroethane	5,100
1,1,1-trichloroethane	19,000
Carbon tetrachloride	2,100
Trichloroethylene	4,300
Tetrachloroethylene	22,000
Toluene	180,000

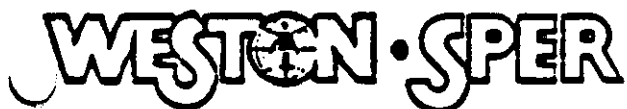
<u>Base Neutrals</u>	
1,2-dichlorobenzene	67,000
naphthalene	98,000
di-n-butyl phthalate	150,000
bis(2-ethyl hexyl) phthalate	850,000

<u>Acid Extractables</u>	
Phenol	29,000

Pesticides/PCB's Not detected

*Note: This sample is currently being tested for flashpoint

AR100175



53 Haddonfield Road, Cherry Hill, NJ 08002 • (609) 482-0222

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-7367

TO: Douglass Fox, OSC US EPA Region III
THRU: Terry Briggs, TATL, Region III TB
FROM: Bhupi Khona, RSO, Region III BOL
SUBJECT: Metro Container analytical results
DATE: December 31, 1987

This report covers review of one liquid discharge sample (S03), one ash sample (S01), two drum samples (S06, S07), and three soil/sludge/water samples (S05, S04, S05). For samples S04 and S07, the water phases were analyzed. All samples were collected on 12/11/87 and shipped to York laboratory on 12/14/87. The samples were analyzed using medium to high concentrations protocol. No QA/QC was requested except surrogate spikes for the organic analyses. The following analyses were requested.

Sample No.	Analysis
S01	EP toxicity, pH, Reactivity, Ignibilite.
S03	Total metals.
S02, S04 to S07	full PP + organic library search

Surrogate spike compounds were added to all the samples run. Most of the surrogate spike recoveries were within acceptable range except as the following:

For samples S06 and S05 two out of three BNA surrogate compounds recoveries were higher than acceptable for range. For sample S05, surrogate compound recoveries were significantly higher than accepted range.

For samples S02, S04, and S05 pesticide surrogate compound recoveries were higher than the acceptable range. The recoveries for sample S05 were significantly higher.

GC/MS tuning data were acceptable.

Matrix spike and matrix spike duplicate analyses were performed on samples S03 for Eptotoxicity parameters. Recovery for Silver was low. The results of matrix spike and matrix spike duplicate analyses agreed well.

Matrix spike and matrix spike duplicate analyses were performed on sample S06 for pp metal. Recoveries for arsenic, cadmium, selenium, silver and zinc were low. Results of matrix spike and matrix spike duplicate analyses for silver, cynide and phenol did not agree very well. The method blank was free of any significant contamination.

A signed chain-of-custody was returned.

CONCLUSION

All the data accepted with following exceptions:

- (1) Reported base neutral and pesticides results for sample S05 may be lower than the actual values.
- (2) In case of water samples, reported results for silver may be lower than actual values.
- (3) In case of solid samples, reported results for arsenic, cadmium, selenium, silver and zinc may be lower than actual values. The results of silver, cynide and total phenol have low confidence levels.

AR100177



DEPARTMENT OF HEALTH & HUMAN SERVICES

ATSDR

Public Health ~~Service~~
Agency for Toxic Substances
and Disease Registry

Memorandum

Date

From Senior Regional Representative
ATSDR, Region III

Subject Health Consultation on Metro Container Corporation Site
Delaware County, PA

To Doug Fox, On-Scene Coordinator
USEPA, Region III

As requested, ATSDR technical staff (Dr. Mark McClanahan) and I have reviewed the data package which you provided to me on April 12, 1988. That data package contained the following:

- Area map
- Site sketch/sampling point map
- 12,3 1/2 X 5 color photographs depicting site conditions, sampling points, and spacial relationships between site and residential area.
- On-site sampling plan
- Offsite migration sampling plan
- QA/QC summary

Specifically, the EPA requested an ATSDR determination as to whether the site posed a threat to the public health based on the information cited above.

In light of the above data, this site does not appear to pose an obvious threat to public health.

This ATSDR consultation constitutes a review of the above cited data only, and should not be considered a complete health assessment of the Metro Container Corporation Site. As additional information is provided, ATSDR will be happy to review it. Please be advised that further review by this agency may necessitate a change or modification of our current advice. If you have additional questions, please call me at (215) 597-7291.

Charles J. Walters
Charles J. Walters

cc: Mr. Buynoski
Dr. McClanahan
Mr. Schultz
File

AR100178

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(Red)



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TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-7367

To: Doug Fox, OSC, Western Response and Oil Enforcement Section, EPA Region III TDD# 8810-47
Charlie Dispoto, OSC, Western Response and Oil Enforcement Section, Region III PCS# 2047

Thru: Terry Briggs, TATL, Region III TB/BVF

From: Rita Sammons, TAT, Region III RS

Subject: Assessment of Environmental Threat at Metro Container Site, Trainer, Delaware County, PA

Date: October 17, 1988

INTRODUCTION

OSC Fox tasked the Roy F. Weston Technical Assistance Team (TAT) to perform an assessment to determine if environmental threats, which require Emergency Response/Removal actions, exist at the Metro Container facility. Emergency Response/Removal actions, including fencing the property and building a containment wall to prevent surface sludge runoff, have recently been completed. These actions were taken to secure and stabilize the site. Additional necessary actions required to complete stabilization were to be evaluated by this assessment.

ACTIONS TAKEN

In order to define these actions, TAT members Sammons and DeAngelis performed an extensive assessment of the site. The following is the result of that assessment which took place from 9/26/88 to 10/10/88.

1) Sampling of Wastes Onsite

TAT performed sampling on 9/26/88 of drums, lagoons, soil and ash onsite. These samples were analyzed for priority pollutants, EP toxicity metals and flash point by Wastex Laboratories, in an effort to further characterize the wastes found onsite. The results indicated, as had been seen in prior sampling 12/87, 2/88, that there is low level organic and metal contamination in the sludge and low levels of metals in the soil and ash (see Tables 1 and 2). However, these levels do not present an emergency environmental threat with respect to air, water and soil contamination.

The levels of volatile organic contaminants were well below the Clean Air Act emission standards. In addition, no above background ambient volatile organic air monitoring readings were obtained during the four weeks of site

Roy F. Weston, Inc.

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION

In Association with ICF Technology, Inc., C.C. Johnson & Malhotra, P.C., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.

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Assessment of Environmental Threat
At Metro Container Site
October 17, 1988
Page Two

work. If sludge were to reach Stoney Creek (the waterway adjacent to the site), contamination of that waterway and to the Delaware River would occur. As a result of the removal action, a containment wall is in place to prevent spillage of the sludge waste into the creek. The wall has been built to sustain a catastrophic release (300,000 gallons) and to last a minimum of two years. Groundwater contamination is not especially applicable in that local residents and businesses receive their water from the Chester Water Authority. The hazard in soil onsite is metal contamination. There are elevated levels of lead to be found in soil and ash samples; however, the lead was not EP toxicity leachable and therefore poses little threat. Although the soil in some areas is covered with sludge, it does not appear, due to its high viscosity, to be moving offsite. Some seepage downward appears to have occurred in the past; not at a rate, however, that would require emergency action. Dust migration of lead and other metals in the soil and ash should not be hazardous due to the low concentrations (50-1200 ppm).

The sludge is defined by 40CFR 261.33 as a hazardous waste, due to intention of the drum reconditioner to discard the residual sludge and recycle only the drum. None of the levels revealed by the analysis require emergency response action. Toluene and phenol, two of the more concentrated contaminants, are defined as toxic wastes. Elevated levels of these have been found in only one of nine samples, in a closed drum. The waste showed no ignitibility characteristics (all flashpoints below 60 degrees F), as would be expected in heavy oil waste products, no cyanide reactivity, no acute hazardous waste components, no EP toxicity metals, no PCB's, no priority pollutant pesticides, nor any other indicator to prompt additional cleanup under the emergency response program. The analysis revealed components typical of waste oil; long alkane chains, benzene derivatives, solvents and lead. As long as these are contained, they pose no emergency threat to the environment.

2) Buried Waste/Drums

In answer to speculation that drums may have been buried onsite, TAT performed a magnetics survey of the site. Although a great deal of interference was created by the large piles of empty drums around the site, the preliminary indication is that no metallic items are buried on the northern part of the site, where the survey was done. (see attached map)

3) Structural Integrity of the Reclamation Building

After reports that the roof was unstable, the reclamation building was inspected by TAT for structural integrity and was found to be in satisfactory condition for work inside as long as no demolition was done to the load bearing walls. This inspection allowed TAT to conduct sampling inside the reclamation building to determine its existing hazards.

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Assessment of Environmental Threat
at Metro Container Site
October 17, 1988
Page Three

4) Sampling in the Reclamation Building

Results from sampling in the reclamation building (10/10/88) received from Lancaster Labs 10/28/88, indicate similar levels of contaminants as the 9/26/88 sampling effort. Detection limits were higher due to the viscous nature of the samples; however, they are still within acceptable limits. These results have not changed the perception of threats at the site, since the contaminants are confined in the building and any activity in that building is expected to be subject to EPA/Enforcement Section scrutiny.

RECOMMENDATIONS

It is the intent of the emergency response program to secure and stabilize threats to public health and safety and to the environment. Steps to accomplish this at the Metro Container Site have been taken. The conditions at the site are not believed by TAT to constitute an emergency. The problems at the Metro site consist of inappropriate storage of hazardous waste and poor housekeeping. The site should receive a full and thorough cleanup. However, the actions needed at the site are of an enforcement and remedial nature. It is recommended by TAT that since securing of the emergency threats at the site, uncontrolled access and surface runoff of sludge in the creek, have been negated by actions taken, the site be turned over by Emergency Response to the EPA/Remedial program and possibly to PA DER for further action.

Attachments: Table 1 - Sample Description and Location 9/26/88
Table 2 - Levels of Contaminants (ppm) 9/26/88
Table 3 - Sample Description and Location 10/10/88
Table 4 - Levels of Contaminants (ppm) 10/10/88
Location map
Site map (magnetics survey and sampling locations)

AR100181

Metro Container Site Table 1 - Sample Description and Location 9/26/88

Sample #	Location	Description
DØ1	Drum - East of Lagoon	Black Sludge/Brown Liquid
DØ2	Drum - South of Lagoon	Black Sludge/Brown Liquid
DØ3	Drum - South of Lagoon	Brown Liquid
DØ4	Drum - North of Lagoon	White Solid
DØ5	Drum - North of Lagoon	Red Liquid
LØ1	Lagoon - Concrete Tank	Sludge
LØ2	Water Treatment Basin	Sludge/Brown Liquid
AØ1	Ash Pile	Grey Solid
SØ1	Soil at Incinerator	Grey Solid

AR100182

ORIGINAL
(Red)

Metro Container Site Table 2 - Levels of Contaminants (ppm) 9/26/88

Sample #	D01	D02	D03	D04	D05	L01	L02	A01	S01
Acetone	104	30	26	22	.5	6	.9	-	-
Trichloroethane	19	4	3	-	-	2	-	-	-
Dichloroethane	-	58	50	5	-	-	-	-	-
Tetrachloroethene	23	6	9	-	-	4	-	-	-
Trichloroethene	-	7	7	-	-	-	-	-	-
Toluene	730	138	148	.4	-	54	-	-	-
Chlorobenzene	-	-	1	-	-	1	-	-	-
Ethylbenzene	118	12	12	-	-	9	-	-	-
Styrene	26	-	5	-	-	7	-	-	-
Xylene	530	63	58	-	-	27	-	-	-
Dichlorobenzene	52	3	2	-	-	2	-	-	-
Phenol	58	9	9	.5	.4	-	3	-	-
Isophorone	24	-	-	-	-	-	-	-	-
Trichlorobenzene	-	-	2	-	-	16	-	-	-
Diethylphthalate	230	-	-	-	-	-	680	-	-
Dibutylphthalate	360	42	31	-	-	36	69	-	-
Ethylhexylphthalate	120	39	43	-	-	32	-	-	2
Napthalene	93	10	9	-	-	65	-	-	.2
Lead	265	575	491	3	3	415	9	295	1280
EP Toxicity						-	-	.4	.09
Chromium	43	75	75	.8	79	77	3	14	186
EP Toxicity						-	-	.05	-
Zinc	379	698	545	20	2	531	4	43	1960
Nickel	26	24	22	9	18	16	7	35	53
Mercury	-	.1	.08	-	-	-	-	-	.1
EP Toxicity						-	-	-	-
Flash Point (F)	>140	118	135	>140	140	124	>140		

AR100183

Metro Container Site Table 3 - Sample Description and Location 10/10/88

Sample #	Location	Description
L01	Sump - Reclamation Building	Black Liquid
L02	Drain - Reclamation Building	Black Liquid
L03	Drain - Reclamation Building	Black Liquid
S01	Under Steps - Reclamation Building	Brown Sludge
S02	Equipment Scrape - Reclamation Building	White and Brown Solid
S03	Floor - Reclamation Building	Brown Sludge

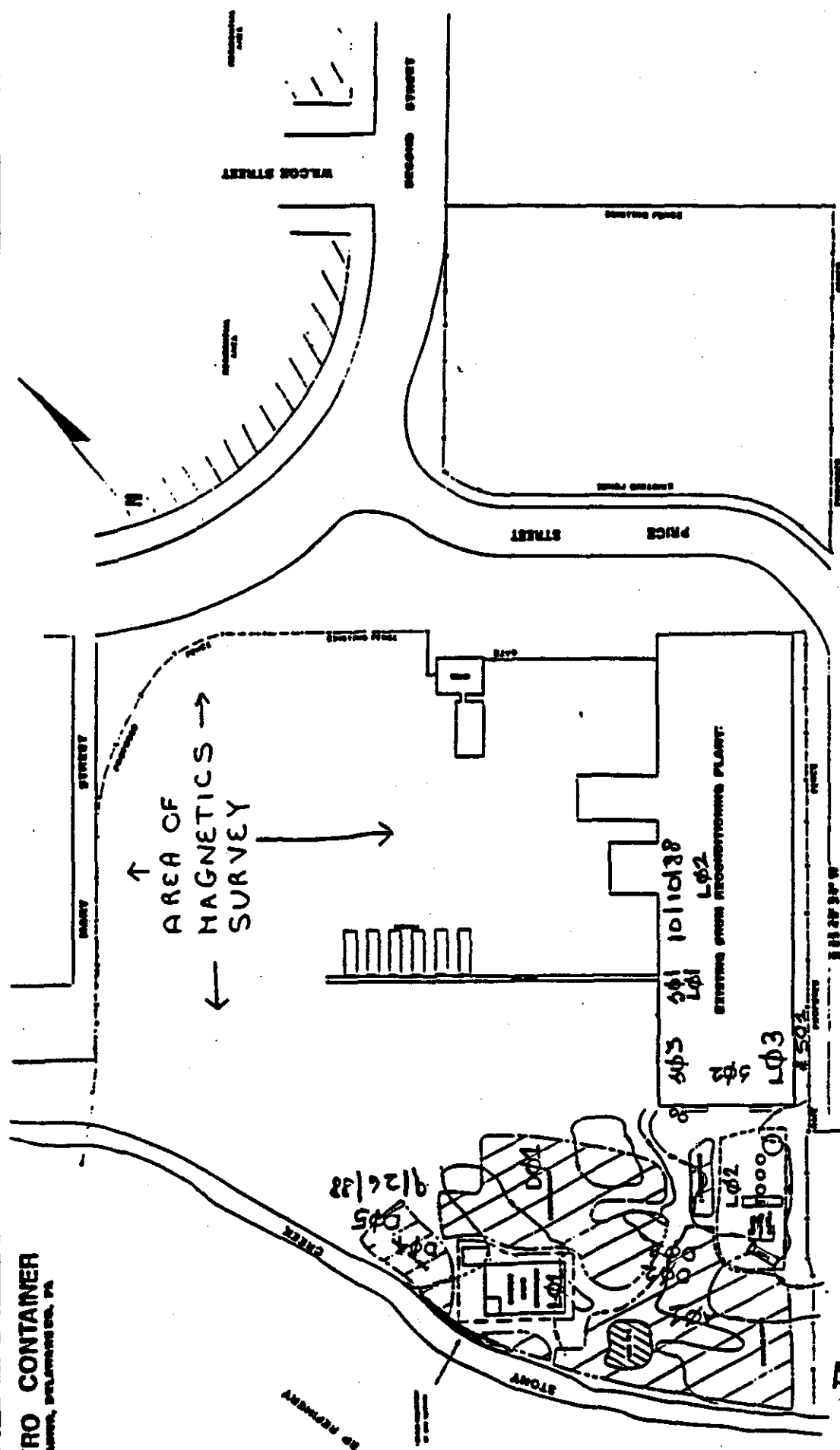
AR100184

Metro Container Site Table 4 - Levels of Contaminants (ppm) 10/10/88

Sample #	L01	L02	L03	S01	S02	S03
Lead	6	68	17	911	1240	988
Zinc	13	80	65	808	530	643
Chromium	-	11	25	522	381	358
Copper	19	15	26	278	333	323
Cadmium	1.7	12	2.9	14.5	7.1	142
Toluene	9	1300	5	13	-	280
Tetrachloroethene	2	69	-	-	-	7
Trichloroethene	1.1	36	-	-	-	1
Chloroform	-	6.5	-	-	-	-
Trichloroethane	-	42	-	-	-	3
Ethyl benzene	2	360	1	3	-	58
Butylbenzylphthalate	11.6	-	.21	-	-	-
Ethylhexylphthalate	19	.58	1.8	-	161	-
Chlorobenzene	-	9.8	-	-	-	-
Isophorone	-	-	.73	-	-	-
Dibutylphthalate	-	-	.4	-	-	-
Cyanide	-	.2	1.2	31.5	19.3	1.2
Phenols	6.9	6.4	5.0	37	5.5	78
Flash Point (F)	>145	>160	>159	>165	>142	>182

AR100185

METRO CONTAINER
TRAVERS, DELAWARE CO., PA.



METRO CONTAINER
TRAVERS, DELAWARE CO., PA.

WESTEN

AR100186

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(Recd)



53 Haddonfield Road, Cherry Hill, NJ 08002 • (609) 482-0222

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-7367

TO: Charles Dispoto, OSC, USEPA Region III TDD# 8810-47
THRU: Terry Briggs, TATL Region II TTB/BVF PCS# 2048
THRU: Mrinal Biswas, TAT Region III Mrinal
FROM: Rita Sammons, TAT Region III RS
Joseph DeAngelis, TAT Region III
SUBJECT: Metro Container Site Survey
DATE: September 26, 1988

On September 20 & 21, 1988 TAT conducted an engineering survey of the Metro Container Site, excluding the reclamation building. The purpose of this survey was to characterize the low lying areas on the site, which once identified will facilitate the construction and insure the performance of the proposed surface migration control.

The western property line of the site borders Stony Creek which is a surface expression of the water migration. With this in mind, emphasis was placed on the following areas:

1. The un-secured drums (most of which have no lids) containing liquids.
2. The sludge pumping station where the accumulation of liquid has exceeded the primary containment and approaches the compromising level of the secondary containment.
3. The water treatment plant which since it's shutdown has accumulated sludge that is now jeopardizing a release from the secondary containment.

The results of the survey identify the areas adjacent the water treatment plant, along Stony Creek as having the lowest elevations on the site. A map has been furnished to graphically illustrate the contours of the site.

The proposed surface migration control must adequately inhibit site surface run-off from infiltrating the creek. However, the close proximity of the concrete sludge containment and the condition of the secondary containment prohibits extensive use of heavy equipment in that area. Therefore, without first pumping off the secondary containment sludge, activity in this vicinity should be limited to hand held power equipment and con-

Roy F. Weston, Inc.

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION

In Association with ICF Technology, Inc., C.C. Johnson & Malhotra, P.C., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.

AR100187

ventional hand held tools. Additionally, attempting to excavate around the perimeter of the site along the creek may ultimately result in undercutting the secondary containment. This would cause the sludge in the secondary containment to flow to the creek under its own hydraulic pressure.

A retaining wall will adequately contain all site liquids and prohibit migration into the adjacent Stony Creek. Although areas of the site are inaccessible and deciphering full drums from empty drums cannot be assumed with any confidence, a representative number of liquid containing drums has been attained and used in arriving at appropriate design parameters for the proposed retaining wall. Approximately 300,000 gallons of site liquids are contained in drums. Because of poor facility practices and over exposure to the elements most of these drums can be observed leaking and overflowing. At a minimum a retaining wall 3 feet in height and 280 feet long will be necessary to contain site liquids if a catastrophic event were to cause all the drums to release their contents (See detailed drawing).

However, this action should in no way be considered a remediation measure. The proposed retaining wall provides only a fixed utility in preventing any material from migrating offsite. Therefore, the effectiveness of this action can not be estimated for any extended period of time.

AR100188



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

PRP notification
letter

ORIGINAL
(Red)

Via Overnight Mail

MAY 19 1988

Distribution List Enclosed

Dear Sir/Madam:

EPA has determined that an imminent and substantial endangerment to the environment as defined by the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), 42 U.S.C. §§ 9601 et seq., exists at the Metro Container Site (Site). An immediate response is necessary to abate this endangerment. EPA plans to initiate Site activities on June 1, 1988. By this letter, EPA is offering your company the opportunity to undertake the activities which are outlined in the scope of work enclosed. Please note that the scope of work describes only an initial phase of work and activities beyond this scope of work may be required at a future date.

Your company, alone or in collection with other entities, must provide EPA with a written offer by May 27, 1988, if you wish to perform the activities described in the scope of work instead of EPA. The offer must contain an unconditional statement of willingness to perform all elements of the scope of work, provide for initiation of Site activities by June 1, 1988, provide for completion of Site activities within 60 days after initiation, and include evidence of your financial and technical ability to perform the required measures.

Please direct your response to:

Lawrence Falkin
United States Environmental Protection Agency
CERCLA Removal Enforcement Section (3HW14)
841 Chestnut Building
Philadelphia, PA 19107

AR100189

If you need further information, or if you have any questions with regard to this matter, please contact Mr. Falkin at (215) 597-6679.

Sincerely,

Neil R. Swanson

for Bruce P. Smith, Chief
Hazardous Waste Enforcement Branch

ORIGINAL

Enclosure

AR100190

Scope of Work - CERCLA Removal
Metro Container Site
Trainer, Delaware County, Pennsylvania

ORIGINAL
(Red)

1. Fencing - The Site must be surrounded by a fence sufficient to control site access. This fence must, at a minimum, be 6 feet chain link topped by 2 strands of barbed wire. Vehicle and personnel gates must be provided as necessary to permit authorized access to the Site.
2. Warning Signs - Warning Signs must be posted at all entrances and at other locations in sufficient numbers to be seen from any approach to the Site.
3. Berm - A berm must be erected which will prevent surface water from the Site from entering Stoney Creek.
4. Leachate Source Identification - Activities must be undertaken to identify the source of contaminants which are entering Stoney Creek through groundwater and leachate seeps.
5. Leachate Source Control - Activities must be undertaken to minimize migration of contaminants which are entering Stoney Creek through groundwater and leachate seeps.

AR100191

AFCO
81 Commercial Avenue
Avenel, NJ 07001

AMF Co.
81 Oak Forrest Drive
Sicklerville, NJ 08081

ARCO Chemical Company
H.A. Sorgenti, President
3801 West Chester Pike
Newtown Square, PA 19073

Amtrak
National Railroad Passenger Corp.
R.T. Noonan
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Washington, DC 20001

Atlantic Refining & Marketing Corp.
Thomas S. Stammel, Esq.
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Southeastern, PA 19398-1050

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Bob Scott, Vice President
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BP America, Inc. - Law Department
Jack L. Litmer
200 Public Square, 39-5300-B
Cleveland, Ohio 44114-2375

C.B. Hooper and Sons
Charles B. Hooper, Jr.
President
Main Street
Intercourse, PA 17534

AR100192

Callahan Chemical Company
James Callahan, Jr.
Manager
Broad & Filmore Avenue
Palmyra, NJ 08065

ORIGINAL
(Red)

Paul W. Callahn, Esq.
Fox, Differ, Callahan, Ulrich & O'Hara
317 Swede Street
Norristown, PA 19401

Capitol Lubricants
Cal Stevens, President
569 Industrial Drive
Lewisbury, PA 17339

John L. Wittenborn
Collier, Shannon, Rill & Scott
1055 Thomas Jefferson St., N.W.
Washington, DC 20007

Chevron Corporation
Daniel E. Vineyard, Esq.
555 Market Street
San Francisco, CA 94120-7141

Conestoga Foundry
Henry Witmeyer, President
Hill Drive & West State Street
Hamburg, PA 19526

Conestoga Fuel
General Manager
1145 Elizabeth Avenue
P.O. Box 4665
Lancaster, PA 17604

Donald B. Kelly
2008 Federal Street
Camden, NJ 08105

E. I. DuPont de Nemours & Company, Inc.
Pamela Meitner, Esq., Legal Department
1007 Market Street
Wilmington, Delaware 19898

AR100193

ORIGINAL
(Red)

EC Barnes Incorporated
Roy Fahnestock, Manager
8632 Lincoln Way, West
St. Thomas, PA 17252

EJ Koenig
Edward Koenig, President
230 Rte. 130 South
Bordentown, NJ 08505

Henry B. Kessler, Esq.
Kessler, Tutek & Gladfelter
325 Farnsworth Avenue
P.O. Box 111
Bordentown, NJ 08505-0111

First State Steel Drum Company
John Ryan, Owner
4030 New Castle Avenue
New Castle, DE 19720

Thomas S. Lodge, Esq.
Connally, Bove, Lodge, & Hutz
1220 Market Building
P.O. Box 2207
Wilmington, DE 19899

Flippo Oil
Harry F. Flippo, President
3030 South Main Street
Harrisonburg, VA 22801-2694

Fritch Fuel Company
Lowell Brogan, Vice President
P.O. Box 1037
116 River Street
Bethlehem, PA 18016

Gilbert Spruance Co.
Richard T. Greene
Richmond & Tioga Streets
Philadelphia, PA 19134

Herb Toy, Incorporated
Box 245
Franklinville, NJ 08322

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Industrial Solvents and Chemical Co.
Andrew P. Rawicz
210 Stevens Road
York Haven, PA 17370

ORIGINAL
Sed

JT Waring and Sons
Vincent Warring, President
4545 South Street
Capitol Heights, MD 20743

JTM Drum
P.O. Box 169
Sayerville, NJ 08872

Jay Gress, Incorporated
Jay Gress, President
1225 W. Ridge Pike
Conshohocken, PA 19428

Kessler Chemical, Inc.
Barry Kessler, President
270 Street Road
New Hope, PA 18938

Lehigh Gas and Oil
Roman Baran, Manager
80 Broad Street
Beaver Meadows, PA 18216

Lightman Drum Company, Inc.
Jerome Lightman, President
Rt. 73, at 12 Mile Marker
Cedarbrook, NJ 08018

Lyondell Petrochemical Corp.
C. T. Corp. Systems
123 South Broad Street
Philadelphia, PA 19134

Mauger and Company, Incorporated
1015 Baltimore Pike
Media, PA 19063

Mobil Oil Corporation
Shari Gulbrandsen, Esq
3225 Gallows Road
Fairfax, VA 22037-0001

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ORIGINAL
(Red)

National Solvents
Rodger Kunis, Vice President
8735 Old Route 13
Tullytown, PA 19007

Norton Petroleum
Barry Norton, President
290 Possum Park Road
Newark, DE 19171

Petroleum Products
Tony Minite, General Manager
P.O. Box 2621
900 Eisenhower Boulevard
Harrisburg, PA 17105

Petrolite Corporation
Ron Stephenson, Manager
4th and Saville Avenue
Eddystone, PA 19013

Pioneer Oil Company
Morton Segal, Vice President
61st and Passyunk Avenue
P.O. Box 16935
Philadelphia, PA 19153

Quality Container Corporation
Morton Lightman, Consultant
P.O. Box 2688
Trenton & Ontario Streets
Philadelphia, PA 19134

Kevin F. Wall, Esq.
407 White Horse Pike
Oaklyn, NJ 08107-1451

Reit Lubricants
Richard Keyser, Vice President
899 Mearns Road
Warminster, PA 18974

Jeffrey A. Smith, Esq.
Clark, Ladner, Fortenbaugh & Young
1818 Market Street, 32nd Floor
Philadelphia, PA 19103

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Reliable Recyclers
Stanley Miller, President
Reliable Industries, Inc.
178 Greenfield Road
Lancaster, PA 17601

Rhodes Drums
Dusty Rhodes, Owner
2000 Federal Street
P.O. Box 2571
Camden, NJ 08105

Robert O'Donnell
607 Wynne Road
Springfield, PA 19064

Rohm & Haas
C.T. Corporate Systems
123 South Broad Street
Philadelphia, PA 19134

Scot Lubricants of PA, Inc.
Glenn D. Krasley
1715 East Tremont St.
Box 505
Allentown, PA 18105

Sentry Paint Technologies, Inc.
Ellis Breskman, President
237 Mill Street, P.O. Box 272
Darby, PA 19023

Sukonik Barrel and Drum Company
Louis Sukonik, Agent
1000 Arboretum Road
Wyncote, PA 19095

Sun Oil Company (SUNOCO)
Mr. Mazzei, General Manager
Green & Delaware Avenue
P.O. Box 395
Marcus Hook, PA 19064

Sun Transport (Division of SUNOCO)
James Nolan, President
P.O. Box 2225
500 West Dutton Mill Road
Aston, PA 19014

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ORIGINAL
(Red)

Thomas A. Crawford
Marine Operations
500 West Dutton's Mill Rd.
P.O. Box 2224
Aston, PA 19014-2224

Superior Drum
218 Crafton Avenue
Pitman, NJ 08071

Tastykake, Inc.
Nelson G. Harris, President
2801 Hunting Park Avenue
Philadelphia, PA 19129
Attn: Paul G. Diorio

Tunnel Barrel and Drum
85 Triangle Boulevard
Carlstadt, NJ 07072

Philip M. Saginario, Esq.
126 Market Street
Paterson, NJ 07505

USX Corporation (US Steel Corporation)
Leo M. Pruett, Esq.
600 Grant Street
Pittsburgh, PA 15230

WN Stevenson
Tom Holsue, Vice President
246 Rockhill Road
Bala Cynwyd, PA 19004

Nancy M. Ware, Esq.
Schnader, Harrison, Segal & Louis
1600 Market Street, Suite 3600
Philadelphia, PA 19103

Westinghouse Electric Corporation
John A. Ristuccia
Dutton Mill Center
800 West Dutton Mill Road
Aston, PA 19014

Wiley's Auto Express, Inc.
Fred Wiley, Jr.
President
Oak Lane & McDade Blvd.
Glenolden, PA 19036

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Table 1-cont'd

*Sample S06- Drum sludge, south of lagoon

<u>Metals</u>	<u>Concentration (ppm)</u>
Arsenic	0.93
Cadmium	3.57
Chromium	24.30
Copper	36.50
Lead	345.00
Mercury	0.63
Nickel	11.20
Zinc	549.00

Cyanide 37.40

Total phenolics 14.50

<u>Volatile organics</u>	<u>Concentration (ppb)</u>
ethylene chloride	1,300
-dichloroethane	1,900
,1-trichloroethane	470
dichloroethylene	320
Tetrachloroethylene	410
luene	9,500
Ethyl benzene	2,000

<u>Base Neutrals</u>	
Naphthalene	48,000
di-n-butyl phthalate	52,000

Acid Extractables Not detected

Pesticides/PCB's Not detected

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(Red)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

JUN 15 1988

James L. Patton, Jr., Esquire
Young, Conaway, Stargatt & Taylor
Eleventh Floor
Rodney Square North
P.O. Box 391
Wilmington, Delaware 19899-0391

Re: Metro Container Site
Trainer, Pennsylvania
Superfund Site

Dear Jim:

Enclosed as we have discussed is a revised draft of the Metro Container CERCLA §106 removal consent order for the Metro Container Site in Trainer, Delaware. In reviewing this draft I have concluded that both Metro Container and Metro Enterprises Container should execute the order. Accordingly, appropriate changes should be made at the time a final draft is prepared for signature. I also wish to advise you that all consent orders are subject to the final review of the Regional Counsel and the Director of the Hazardous Waste Management Division.

I suggest that you call me (215/597-8905) on Monday, June 20 so that we can schedule a meeting to resolve any issues that may be outstanding in the negotiation of the order.

Sincerely yours,

Diane Ajl
Assistant Regional Counsel

Enclosure
cc (w/ encl.): Larry Falkin

AR100200

Region III

JUN 15 1988

In the Matter of:)

Metro Container Corporation Site)

Metro Container Corporation)
Respondent)

Docket No: _____

Proceeding under Section 106(a) of the)
Comprehensive Environmental Response,)
Compensation, and Liability Act of 1980)
(42 U.S.C. § 9606(a), as amended by the)
Superfund Amendments and Reauthorization)
Act of 1986, Pub. L. No. 99-449, 100)
Stat. 1613 (1986).)CONSENT AGREEMENT AND ORDER

The following Consent Agreement and Order ("Order") by and between the United States Environmental Protection Agency ("EPA") and the Metro Container Corporation ("Respondent") is issued pursuant to the authority vested in the President of the United States of America by Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. § 9606(a), as amended by the Superfund Amendments and Reauthorization Act of 1986, ("SARA") Pub. L. No. 99-499, 100 Stat. 1613 (1986) and delegated to the Administrator of EPA on January 23, 1987, by Executive Order 12580, 52 Fed. Reg. 19 (1987), and further delegated to the Regional Administrators of EPA. This Order pertains to a property more particularly described below, located in Trainer, Delaware County, Pennsylvania.

AR100201

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The actions taken pursuant to this Order shall be consistent with the National Oil and Hazardous Substances Contingency Plan ("NCP"), 40 C.F.R. § 300.65. Notice of the issuance of this Order has been given to the Commonwealth of Pennsylvania pursuant to Section 106(a) of CERCLA, 42 U.S.C. § 9606(a).

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(Rec'd)

This Order shall apply to, and be binding upon the parties and their respective agents, successors, and assigns and upon all persons, contractors, and consultants acting under or for the parties.

I. STATEMENT OF PURPOSE

In entering into this Consent Order, the mutual objectives of EPA and Respondent are to conduct a removal action, as defined in Section 101(23) of CERCLA, 42 U.S.C. § 9601(23), to abate, mitigate, and/or eliminate the release or threat of release of hazardous substances at the Metro Container Corporation Site ("Site").

The specific purpose of this Order is to control access to the Site, prevent further releases of hazardous substances, and prevent further migration of hazardous substances into Stoney Creek. Both parties anticipate that removal activities beyond the scope of this Order may be necessary and may be the subject of future negotiations.

II. FINDINGS OF FACT

EPA has determined that:

1. The Metro Container Corporation ("Metro") site is located at West Second Street and Price Road in Trainer, Delaware County, Pennsylvania.

AR100202

2. The Site, located in an industrial area, is bounded by an oil refinery to the west and a scrap yard to the east with railroad lines and the Delaware River to the south and residences to the north. Stoney Creek, a tributary to the Delaware River, borders the western edge of the Site.

3. The Site has been used for approximately 20 years as a recycling and reclaiming facility for used drums. Metro became the owner and operator of the Site on February 11, 1983.

4. The Site operation consisted of receiving empty drums, as defined at 40 C.F.R. § 261.7, cleaning and reconditioning them, and selling them. According to Metro, wastes from the drum cleaning process were either incinerated on site or routed through an on-site sludge treatment process. The incinerator ash was shipped to an off-site disposal facility. Some of the treated sludge was discharged to the local sewage system under agreement with the local sewer authority. The remainder of the sludge was shipped to an off-site disposal facility.

5. In or around June, 1987, Metro ceased using its sludge treatment system because it became non-functional. At that time, sludge began accumulating at the Site. The sludge was stored in an open lagoon and in used drums that had been sent to the Site for reclamation.

6. In early November, 1987, Metro cut back its operations by approximately 50% because it was unable to manage the sludge buildup.

7. On December 7, 1987, Metro filed for bankruptcy under Chapter 11 of the Bankruptcy Code. Metro ceased operations on December 11, 1987.

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8. EPA employees and contractors conducted an inspection of the Site on December 11, 1987. The inspection revealed an open cement lagoon containing waste sludge (approximately 1300 gallons), 500 to 1000 55-gallon drums of waste sludge, and approximately 60,000 unreclaimed drums. The lagoon was filled beyond capacity and was on the verge of overtopping its banks. Visual evidence was present that the lagoon had, in the past, overtopped its banks. Many of the drums containing sludge were in poor condition, were uncovered, and appeared partially filled with rainwater. Sludge was also present on the ground in the vicinity of the sludge storage drums.

9. Samples were taken during the December 11, 1987, inspection. The sample locations are shown on the map in Appendix 1 which is attached hereto and made a part hereof. The results of the sampling are shown in the tables in Appendix 2 which are attached hereto and made a part hereof.

10. The substances listed in Appendix 2 are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).

11. The toxicological effects of the hazardous substances listed in Appendix 2 are presented in Appendix 3, attached hereto and made a part hereof.

12. The Site is not completely fenced and no 24-hour security system is in place.

III. CONCLUSIONS OF LAW

13. The Site is a "facility" as defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

14. Respondent is a "person" within the meaning of Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

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15. Hazardous substances as defined in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14) have been disposed of at the Site and are currently present there.

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16. The past, present, and/or potential migration of hazardous substances at and/or from the Site constitutes an actual and/or threatened "release" as defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).

17. Respondent is liable as a responsible party pursuant to Section 107(a) of CERCLA, 42 U.S.C. § 9607(a).

IV. DETERMINATION

18. Based upon the Findings of Fact and Conclusions of Law, the EPA Regional Administrator for Region III has determined that there may be an imminent and substantial endangerment to the public health, welfare, or the environment as a result of the release or threat of release of hazardous substances at and/or from the Site.

19. The Regional Administrator has determined that the actions set forth below must be taken to protect public health and welfare and the environment.

V. WORK TO BE PERFORMED

20. "Days" as used in this Order shall mean calendar days unless otherwise specified.

21. Within seven (7) days of the effective date of this Order, Respondent shall complete the following measures:

a. Implement Site security sufficient to prevent accidental or unknowing entry to the Site by the public.

b. Retain a qualified contractor or identify qualified employees who will develop and implement the Work Plan described

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below in paragraph 21 and notify EPA in writing regarding the identity and qualifications of the person or persons who will be primarily responsible for carrying out the terms of this Order.

EPA may disapprove the use of any supervisory personnel, contractor and/or subcontractor if EPA believes they are not qualified to perform the response work. In the event of a disapproval, Respondent shall notify EPA within seven (7) days of the person, contractor or subcontractor who will replace the one(s) whom EPA disapproved. EPA may not unreasonably withhold this approval.

c. Take any actions necessary to immediately stop any ongoing leaks or releases of hazardous substances and ensure that no further releases occur prior to the implementation of the Work Plan required below.

21. Within twenty-one (21) days of the effective date of this Order, Respondent shall submit to EPA a Work Plan which:

a. when implemented, permanently eliminates the release and threat of release of hazardous substances from the Site.

b. when implemented, prevents the migration of hazardous substances to and into Stoney Creek.

c. contains a site safety program which is sufficient to minimize the potential for exposure of personnel and the public to hazardous substances during performance of the work specified therein.

d. contains a schedule for the implementation of all tasks specified in the Work Plan. This schedule shall not exceed 60 days for the achievement of the above objectives.

7
a. provides for EPA to receive notice at least 72 hours prior to the commencement of any activities related to this Order.

22. EPA shall review the Work Plan submitted pursuant to paragraph 21. If EPA approves the Work Plan, Respondent shall begin implementation of the Work Plan within 5 days of notification by EPA of its approval. If EPA disapproves or conditionally approves the Work Plan, EPA will specify the deficiencies or conditions in writing. Respondent shall, within 7 days following receipt of a conditional approval, modify the Work Plan to satisfy the conditions and begin implementing the Work Plan as modified. Respondent shall, within 7 days following receipt of a disapproval, modify the Work Plan to remedy the specified deficiencies and resubmit the Plan to EPA. In the event of disapproval of the revised Plan, EPA retains the right to submit its own plan to the Respondent and to require the Respondent to perform the tasks set forth therein, or to perform the work itself and to seek to recover costs from the Respondent for such work pursuant to Section 107 of CERCLA, 42 U.S.C. § 9607.

23. Respondent shall report to EPA on a regular schedule which shall be specified in the Work Plan and shall provide the dates that each task was initiated and completed, as well as all information developed and sample results obtained. Respondent shall provide any information related to the Site cleanup specifically requested by EPA within 72 hours of receipt of the request. Within 45 days after completing the

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work required by this Order, the Respondent shall submit a final report detailing activities completed and data gathered.

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(Red)

24. Respondent and EPA or their designees shall arrange a final inspection of the Site following completion of the measures described above to verify compliance with the requirements of this Order. EPA shall subsequently notify Respondent of its determination of satisfactory compliance with the terms of the Order, or in the event that EPA determines that compliance is not satisfactory, EPA shall specify the deficiencies and the necessary corrective actions. In the event that EPA determines that compliance is not satisfactory, the Respondent will undertake and complete the necessary corrective actions within fourteen (14) days of receipt of EPA's notice of disapproval.

25. No change in ownership or corporate or partnership status relating to the Site will in any way alter the responsibility of the Respondent under this Order. In the event of any change in ownership or control of the Site, Respondent shall notify the EPA in writing at least thirty (30) days in advance of such change and shall provide a copy of this Order to any successor in interest or anyone who may obtain any right or title in interest in the Site prior to any agreement for change in ownership or control.

26. Respondent shall comply with all applicable Federal, State, and local government statutes, regulations, and ordinances when carrying out activities pursuant to this Order.

ARI00208

27. Respondent shall provide a copy of this Consent Order to all contractors, sub-contractors, laboratories, and consultants retained to conduct any portion of the work performed pursuant to this Order.

28. All work must be performed in accordance with the Occupational Safety and Health Administration's rules and regulations governing hazardous waste operations, 29 C.F.R. Part 1910.

VI. DESIGNATED PROJECT OFFICERS

29. On or before the effective date of this Consent Order, EPA and Respondent shall each designate a Project Officer ("PO"). Each PO shall be responsible for overseeing the implementation of this Order. To the maximum extent possible, communications between Respondent and EPA and all documents, including reports, approvals, and other correspondence concerning the activities performed pursuant to the terms and conditions of this Order, shall be directed through the Project Officers. EPA and Respondent each have the right to change their respective PO. Such a change shall be accomplished by notifying the other party in writing at least five (5) days prior to the change. The EPA PO's authority shall include the authority to halt, modify, conduct, or direct any tasks required by this Consent Order or portions thereof or to take any response actions when conditions present an immediate risk to public health or welfare or the environment as described in 40 C.F.R. § 300.65 due to noncompliance with the requirements of this Order, unsafe working conditions or improper work practices, or any changed or unanticipated problems, conditions, or events. The PO's actions shall, at all times,

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be controlled by the guidance and authority of the National Contingency Plan, 40 C.F.R. Part 300. The PO for EPA shall be:

ORIGINAL
(Red)

Lawrence Falkin, Compliance Officer
United States Environmental Protection Agency
CERCLA Removal Enforcement Section (3HW14)
841 Chestnut Building, 6th Floor
Philadelphia, PA 19107
Telephone: (215) 597-6679.

The absence of the EPA PO from the Site shall not be a cause for the stoppage of work.

VII. SAMPLING AND ACCESS

29. At the request of EPA, Respondent shall allow split or duplicate samples to be taken by EPA and/or its authorized representatives, of any samples collected by Respondent pursuant to the implementation of this Order. Respondent shall notify EPA not less than seventy-two (72) hours in advance of any sample collection activity.

30. In addition to its authority under Section 104 of CERCLA, 42 U.S.C. § 9604, EPA and its authorized representatives shall have the authority to enter and freely move about the Site at all reasonable times for the purpose of, inter alia: inspecting records, operating logs, and contracts relating to the Site; reviewing the progress of Respondent in carrying out the terms of this Order; conducting such sampling and tests as EPA deems necessary; and verifying the data submitted to EPA by Respondent. Respondent shall permit such persons to inspect and copy all records, files, photographs, documents, and other writings, including all sampling and monitoring data, which in any way pertains to work undertaken pursuant

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to this Order, provided however, that nothing herein shall constitute a waiver of documents protected by the attorney-client privilege or the attorney work-product doctrine. EPA reserves such rights as it may have to seek access to such documents and if Respondent withholds such documents it shall provide to EPA an index of the documents withheld and a statement supporting the claim of privilege or work-product. All parties with access to the Site pursuant to this paragraph shall comply with all approved health and safety plans. To the extent that property included in the sampling and removal area is owned or controlled by parties other than the Respondent, the Respondent will use all reasonable efforts to obtain access agreements from the present owners within twenty (20) days of the effective date of this Order. Such agreements shall provide reasonable access for EPA, Respondent, and their representatives. In the event Respondent cannot obtain such access agreements within the time designated above, EPA shall be notified immediately in which case EPA shall further consider the appropriate means of gaining access.

VIII. EFFECTIVE DATE AND SUBSEQUENT MODIFICATION

31. The effective date of this Order shall be the date on which it is signed by EPA.

32. This Order may be amended by mutual agreement of EPA and Respondent. Such amendments shall be in writing and shall become effective on the date on which such amendments are signed by EPA. Minor changes to the Work Plan and schedule may be made by mutual agreement of the EPA's and Respondent's POs. Such changes shall become effective at the time of agreement

and shall be confirmed by EPA within 5 days by letter.

33. Any reports, plans, specifications, schedules, or other ^{ORIGINAL} (Red) submissions required by this Consent Order, with the exception of site access agreements between the Respondent and third parties, are, upon approval by EPA, incorporated into this Consent Order. Any non-compliance with such EPA-approved reports, plans, specifications, schedules, or other submissions shall be considered non-compliance with the requirements of this Consent Order and will subject the Respondent to the requirements of Section X "Stipulated Penalties".

34. No informal advice, guidance, suggestions, or comments by EPA regarding reports, plans, specifications, schedules, and other writing(s) submitted by the Respondent may be construed as relieving the Respondent of its obligation to obtain formal approval when required by this Order.

IX. QUALITY ASSURANCE

35. The Respondent shall use quality assurance, quality control, and chain of custody procedures in accordance with the "EPA NEIC Policies and Procedures Manual" dated May 1978, revised November 1984, EPA Document 330/9-78-001-R and "Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans," December 1980, QAMS-005/86, while conducting all sample collection and analysis activities required by this Order. The Respondent shall consult with EPA in planning for, and prior to, all sampling and analysis required by the approved Work Plan.

X. FORCE MAJEURE

36. The Respondent shall notify EPA of any delay or anticipated delay in achieving compliance with the requirements of this Order. Said notification shall be made verbally as soon as possible but not later than two (2) business days after Respondent becomes aware of such delay or anticipated delay, and in writing not later than five (5) calendar days after becoming aware of such delay or anticipated delay. The written notification shall state: (1) the nature of the delay; (2) whether and the reason why the delay is beyond the control of the Respondent; (3) the action that will be taken to mitigate, prevent or minimize further delay; (4) the anticipated length of the delay; and (5) a timetable for the action to mitigate, prevent or minimize the delay. The Respondent shall adopt all reasonable measures to avoid or minimize any such delay.

Any delay that results from circumstances beyond the control of the Respondent that cannot be overcome by due diligence shall not be deemed to be a violation of the Respondent's obligations under this Order; nor shall it make the Respondent liable for penalties pursuant to this Order resulting from such a delay. To the extent a delay is caused by circumstances beyond the control of the Respondent, the schedule affected by the delay shall be modified to account for the delay resulting from such circumstances. Increased costs of performance or changed economic circumstances shall not be considered circumstances beyond the control of the Respondent.

Failure of the Respondent to comply with the notice requirements of this Section shall render this Section void and constitute a waiver of the Respondent's right to invoke ^{ORIGINAL} (Reg) the benefits of this Section.

In the event that EPA and the Respondent cannot agree that any delay in compliance with the requirements of this Order has been or will be caused by circumstances beyond the reasonable control of the Respondent that cannot be overcome by due diligence, the dispute shall be resolved in accordance with the provisions of the "Dispute Resolution" Section, Section XI, of this Order. The Respondent shall have the burden of proving that the delay was caused by circumstances beyond its control which could not have been overcome by the exercise of due diligence, the necessity of the proposed length of the delay, and that the Respondent took all measures to avoid or minimize delay.

XI. DISPUTE RESOLUTION

37. If the Respondent objects to any EPA notification of deficiency, disapproval, or other EPA action taken pursuant to this Order, the Respondent shall notify EPA in writing of its objection(s) within fourteen (14) days of such notification or action. EPA and the Respondent shall have an additional fourteen (14) days from the receipt by EPA of the notification of objection from the Respondent to reach agreement. If agreement cannot be reached on any issue within this fourteen (14) day period, EPA shall provide a written statement of its decision to the Respondent.

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XII. STIPULATED PENALTIES

38. If Respondent fails to perform any work or submit any reports as set forth in the Work Plan, in accordance with the schedule contained therein, Respondent shall pay into the Hazardous Substances Superfund, within thirty (30) calendar days of demand, the sums set forth below as stipulated penalties. Checks shall be made payable to the Hazardous Substances Superfund and should be mailed to:

EPA - Superfund
P.O. Box 371003M
Pittsburgh, PA 15251

A copy of the check and transmittal letter shall be sent to the EPA PO. Stipulated penalties shall accrue in the amount of \$1,000 per day for the first week or any portion thereof, \$2,000 per day for the next three (3) weeks thereafter or any portion thereof and \$5,000 per day for each week thereafter or any portion thereof. The stipulated penalties set forth in this Section do not preclude EPA from pursuing any other remedies or sanctions available to EPA by reason of the Respondent's failure to comply with any of the requirements of this Order. The collection of stipulated penalties is stayed during the pendency of Dispute Resolution under Section XI hereof, except that said penalties shall continue to accrue during this period of time. Upon conclusion of the Dispute Resolution procedures set forth under Section XI, payment of all accrued stipulated penalties shall be due within fourteen (14) calendar days of Respondent's receipt of EPA's written decision.

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XII. STATUTORY PENALTIES

39. Respondent is advised that willful violation or failure or refusal to comply with this Order, or any portion hereof, may subject the Respondent to a civil penalty of not more than \$25,000 for each day in which such violation occurs or such failure to comply continues, in accordance with Section 106(b) of CERCLA, 42 U.S.C. § 9606(b). Failure to comply with the Order, or any portion thereof, without sufficient cause, may also subject Respondent to liability for punitive damages in an amount of up to three times the amount of any costs incurred by the Fund, as defined in Section 101(11) of CERCLA, 42 U.S.C. § 9601(11), as a result of such failure to take proper action, in accordance with Section 107(c)(3) of CERCLA, 42 U.S.C. § 9607(c)(3).

XIV. RESERVATION OF RIGHTS

40. Except as expressly provided in this Order, (1) each party reserves all rights and defenses it may have, and (2) nothing herein shall prevent EPA from seeking legal or equitable relief to enforce the terms of this Order, including the right to seek injunctive relief, and imposition of statutory penalties.

41. As provided by this Order, EPA expressly reserves its right to disapprove of work performed by the Respondent and reserves its right to request that the Respondent perform response actions in addition to those required by this Order, if it determines that such actions are necessary. In the event that the Respondent declines to perform such additional actions, EPA reserves the right to undertake such actions and

seek reimbursement for costs incurred pursuant to Section 107 of CERCLA, 42 U.S.C. § 9607. In addition, EPA reserves the right to undertake removal and/or remedial actions at any time that such actions are appropriate under the NCP and seek reimbursement for any costs incurred pursuant to Section 107 of CERCLA, 42 U.S.C. § 9607.

XV. OTHER CLAIMS

42. Nothing in this Order shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership, or corporation not bound by this Order for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous wastes, pollutants, or contaminants found at, taken to, or taken from the Site.

43. The Respondent hereby waives any claim to reimbursement it may have under Section 106(b) of CERCLA, 42 U.S.C. § 9606(b).

44. This Order does not constitute any decision on preauthorization of funds under Section 111(a)(2) of CERCLA, 42 U.S.C. § 9611(a)(2).

XVI. CONSENT

45. The Respondent agrees to undertake all actions required by the terms and conditions of this Order, but does not otherwise commit to undertake any other action hereby. The Respondent consents to and will not contest EPA jurisdiction regarding this Order.

AR100217

XV. REIMBURSEMENT OF COSTS**DRAFT**

46. At the termination of this Consent Order, EPA shall submit to the Respondent an accounting of all response and oversight costs incurred by the U.S. Government with respect to this Consent Order. Oversight costs shall consist of all costs incurred by EPA, its agents or contractors in connection with EPA's oversight of the work to be done by the Respondent under the terms of this Consent Order. The Respondent shall, within thirty (30) calendar days of receipt of that accounting, remit a check for the amount of those costs made payable to the Hazardous Substances Response Superfund. Checks should specifically reference the Site and be addressed as specified in Section XII of this Order.

XVII. TERMINATION AND SATISFACTION

47. The provisions of this Order shall be deemed satisfied upon Respondent's receipt of written notice from EPA that to the satisfaction of EPA, which approval shall not be unreasonably withheld, all of the terms of this Order have been adequately completed.

The undersigned representative of the Respondent certifies that he or she is fully authorized by the Respondent to enter into the terms and conditions of this Order, to execute this Order, and to legally bind the Respondent to this Order. This Order will become effective upon signature by the Regional Administrator.

XVIII. ADMISSIONS

47. Nothing in this Consent Order, including the Work Plan

AR100218

DRAFT

identified in Section V hereof, is intended by the parties to be, nor shall it be, an admission of facts or law or determinations, an estoppel, or a waiver of defenses by the Respondent for any purpose, other than the enforcement of this Consent Order, and Respondent specifically does not admit any matter of fact or law set forth herein including that the conditions at the Metro Container Site present an imminent and substantial endangerment to public health, welfare, or the environment, or that such conditions constitute a release or threat of a release of hazardous substances. Participation in this Consent Order by the Respondent is not intended by the parties to be, and shall not be, an admission of any fact or opinion developed by the contractor in the completion of the work. The terms of this Consent Order, including the Work Plan, shall not be construed more or less favorably for or against any party hereto. This Consent Order shall not be admissible in any proceeding except to enforce the terms of this Order.

IT IS SO AGREED AND ORDERED:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: _____

BY: _____
JAMES M. SEIF
REGIONAL ADMINISTRATOR
EPA, REGION III

RESPONDENT

DATE: _____

BY: _____
Name (Signed)

Name (Print or Type)

Title ART00219

ORIGINAL
(Red)

WESTON • SPER

53 Haddonfield Road, Cherry Hill, NJ 08002 • (609) 482-0222

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-7367

MEMORANDUM

TO: Douglas Fox, OSC, EPA Region III
Western Response and Oil Enforcement Section

THRU: Terry Briggs, TATL, Region III *BVF/TB* TDD #8810-48B
PCS #2163

FROM: Rita Sammons, TAT Region III *18*
Joseph DeAngelis, TAT Region III

SUBJECT: Review of Metro Container Site Scope of Work
Trainer, Delaware County, PA

DATE: February 13, 1989

Introduction

The Roy F. Weston Technical Assistance Team (TAT) was tasked by OSC Fox to review the work plan for the Metro Container Site proposed by the Potential Responsible Parties' (PRPs) Steering Committee. The Metro Container Site is a two acre site which has been the subject of a CERCLA Removal Action begun in September, 1988. The site is located in a residential neighborhood in Trainer, Delaware County, Pennsylvania, adjacent to the BP Refinery and to Stoney Creek, a tributary to the Delaware River. Threats at the site include 2,500 drums, a 180,000 gallon lagoon and its 25,000 gallon secondary containment, all of which are filled with sludge that is characteristic of sludge waste from the petroleum and paint industries. Stabilization measures taken at the site include fencing to control access to the site and construction of a retaining wall to prevent a catastrophic release of waste material into Stoney Creek. Additional funding for disposal of the sludge waste contained in the lagoon and secondary containment has been approved, but removal operations have not restarted, due to willingness of the PRPs to assume responsibility for the clean up. The first step in the PRPs taking over operations at the Metro Container Site has been the submittal of a proposed scope of work.

This scope of work, dated February 6, 1989 addresses surface contamination at the site and does not address potential groundwater contamination. The tasks included in the work plan are summarized below along with the TAT evaluation of each of the tasks.

Roy F. Weston, Inc.

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION

In Association with ICF Technology, Inc., C.C. Johnson & Malhotra, P.C., Resource Applications, Inc.,
Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.

AR100220

1. Drain the lagoon and secondary containment, cut, drain and plug all connections, and clean and cap both areas.
Evaluation - This task is similar to that proposed under the present EPA CERCLA Removal Project.
- 2a. Inspection of all drums on site to determine if they meet the definition of "RCRA empty". All RCRA empty drums are to be removed from site for disposal or recycling.
Evaluation - Disposal and recycle options should be listed under this task. These drums are to meet the "containing less than one-inch of material" definition as found in RCRA 261. and therefore would be are RCRA exempt. In order to assure that these "RCRA empty" drums are not left at a site similar to Metro Container, these drums are to be disposed of at a RCRA permitted facility or recycled at a facility which maintains high standards for operations. It is imperative the net result of this removal does not result in the transference of the drums from one problem area to another, with the time and money invested in their removal wasted.
- 2b. Drums containing waste materials will be sampled and analyzed to characterize the waste and establish a compatibility scheme for bulking. The bulking procedure will be implemented from this scheme. Evaluation - Specifics are required on types of analysis for characterization of the waste. For example, whether metal analysis, priority pollutant analysis, RCRA characteristics analysis, etc. are included in the waste characterization. Also, the percentage of drums to be sampled has not been specified. A compatibility scheme usually involves sampling of all drums and then creating a scheme from the results. Without this data, visual judgement will be required to formulate the bulking scheme. Field compatibility testing is recommended before the actual bulking process begins.

3. Storage tank and roll-off wastes are to be sampled, broken into compatibility class, bulked and disposed. The tanks and roll-offs will be cleaned and removed from the site. Evaluation - The same concerns for 2b hold true for this item. In addition, TAT has been told that the roll-offs are the property of a Metro Container business associate and that several of the on-site tanks have been sold to interested buyers.
4. The insulation at the site will be sampled and analyzed for asbestos. Any insulation containing asbestos will be removed and disposed. Evaluation - It is not clear whether this item includes sampling of every piece of insulation onsite or a percentage of the insulation.
5. Dispose of pooled liquids, in the tank containment areas and in the drum storage areas. Evaluation - It should be noted that Metro employees and Pennsylvania Department of Environmental Resources (PA DER) have informed TAT that these retained liquids may be as deep as ten feet. Extreme caution should be used while working in this area.
6. All visibly contaminated and stained soil is to be excavated and disposed. The area will be graded and covered. Evaluation - There is no quantifier on the depth of soil contamination except "visible". TAT has observed subsurface contamination in various areas. A sampling program should be included to quantify the depth of soil needing to be scraped.

Conclusion

This work plan, although preliminary, encompasses much of the work needing to be accomplished in order to effectively clean up the Metro Container Site. The final work plan should address the following concerns as well:

- a) There is a lack of deadlines, work schedules or time lines, and a lack of an order of events in the cleanup. A critical path of

AR100222

tasks with a time frame including a start date, completion date, and interim reporting requirements should be presented. Documentation showing the project progression should be submitted.

- b) Who is expected to carry out which task and under whose direction? The ability of a registered contractor to perform the work according to local, State and Federal requirements, including RCRA, CERCLA, and OSHA, should be proven and presented.
- c) Will the PRP steering committee assume security responsibilities during the project? Information received from Metro representatives currently on site is that the property will be totally abandoned at the end of March, 1989.
- d) Whether the drums on the east side of the property (across Price St.) will be addressed by this cleanup?
- e) Whether any pipelines running from the building have been considered for draining and capping? Underground piping is also a concern.
- f) Has reclamation building demolition been considered, given the poor condition it is in? It is anticipated that the removal of equipment will be completed by the end of March, 1989 and an empty shell of a building will remain.
- g) What disposal options are being considered for the wastes? A list of proposed disposal sites, which are RCRA approved facilities, should be included.
- h) What types of solutions will be used for cleaning waste containers and how will they be disposed?
- i) What safety plan is to be used and what levels of protection are anticipated for each task?
- j) Whether or not the abandoned tank truck on site

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(Red)

Review of Metro Container Site Scope of Work
Trainer, Delaware County, PA
February 13, 1989
Page 5

will be addressed in this clean up?

- k) The types of analyses for each waste should be specified as well as the QA/QC procedures of data that will be required from the laboratories.

The above concerns are not intended to be all-encompassing, but reflect points which need consideration before clean-up operations by the PRPs can begin at the site.

RS/mr

Attachments: Scope of Work submitted by
the PRP Steering Committee - 4 pages

AR100224

SAUL, EWING, REMICK & SAUL

3800 CENTRE SQUARE WEST

PHILADELPHIA PA 19102

(610) 576-7777

CABLE ADDRESS S.08AL

TELECOPIER (610) 576-7788

TWR 83-4788

ORIGINAL
(Red)

88 VALLEY STREAM PARKWAY
SUITE 220
GREAT VALLEY CORPORATE CENTER
MALVERN PA 19355
(610) 881-8080

PLAZA 1000
SUITE 604
EVERMAN AND ARDENSON ROADS
VOORHEES NJ 08042
(609) 424-0000

388 DELAWARE AVENUE
P. O. BOX 1888
WILMINGTON DE 19808
(302) 624-1012

1801 L STREET, N. W.
SUITE 700
WASHINGTON, D. C. 20036
(202) 323-7000

TWENTY-FIRST FLOOR
827 PARK AVENUE
NEW YORK NY 10017
(212) 881-3381

DIAL DIRECT (610)

972-7171

February 6, 1989

VIA TELECOPY

Mr. Larry Falkin
U.S. EPA (3 RC22)
841 Chestnut Building
Philadelphia, PA 19107

Re: Metro Container Scope of Work

Dear Larry:

Per our discussion, enclosed please find our proposed Scope of Work. Representatives of our technical committee and Mike Budin are prepared to discuss this material at your convenience. Please contact Nancy Kilbourn (977-3974) or me to make arrangements.

Thank you for your cooperation.

Sincerely,


Carl B. Everett

CBE:tr
Enclosure
cc: Metro PRP Group
Mr. Michael Budin

AR100225

ORIGINAL

METRO CONTAINER

SCOPE OF WORK

The tasks set forth below are intended to address those aspects of the Metro Container site which represent a threat to public health by way of direct contact. Groundwater considerations are addressed to the extent that surface activities remove the potential for contamination. As used throughout this Scope of Work, the terms "disposal" and "dispose" refer to removal from the site and disposal in accordance with applicable federal and state regulations.

The proposed tasks are as follows:

1. Drain the concrete tank (lagoon) and secondary containment area around the tank of all waste materials and cut and plug all piping and drain connections to the tank. Clean the tank and line with an impervious membrane. Fill the tank with an appropriate material (soil, sand, etc.), cap with clay and/or an impervious membrane, and cover with top soil and vegetation. Dispose of all liquids and sludges.
2. All drums on site will be visually inspected to determine both the nature and composition of the contents. This includes both the drums which are currently assumed to contain waste sludges and those assumed to be empty. This also includes all the drums in the drum recycling plant and loading dock, which will be relocated from the building to

AR100226

the west side of the property and handled in the same manner as the other drums currently on the site.

All RCRA empty drums, determined by the visual inspection, will be removed from the site and properly disposed or recycled.

Those drums which contain waste materials will be sampled using a statistically based random sampling plan. The samples will be analyzed for screening parameters to determine the nature of the waste, hazardous characteristics and compatibility for bulking. Compatible materials will be bulked, and all wastes and drums will be disposed.

3. All of the storage tanks and roll-off containers on site will be sampled and the contents analyzed for screening parameters. Compatible materials from the tanks will be bulked, and all wastes will be disposed. The tanks will be emptied, cleaned, dismantled and removed from the site for disposal or recycling. The roll-off containers will be removed for disposal of their contents. The storage tanks include both those tanks containing sludge and those containing the raw materials for the drum cleaning process (acid, caustic, fuel oil, etc.).

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4. The insulation on all externally insulated tanks will be sampled and analysed for asbestos. Any insulation containing asbestos will be properly removed and disposed.
5. Dispose of all pooled liquids in the tank containment areas and in the drum storage areas.
6. All visibly contaminated and stained soil will be scraped and disposed. To prevent direct contact from any remaining contamination, the remaining soil will be graded and topped with an appropriate cover material (top soil, stones, vegetation, etc.).

AR100228

LAW OFFICES OF

SAUL, EWING, REMICK & SAUL

3800 CENTRE SQUARE WEST

PHILADELPHIA PA 19102

(610) 578-7777

CABLE ADDRESS: BIDEAL
TELECOPIER (610) 578-7788
TWA 83-478866 VALLEY STREAM PARKWAY
SUITE 220
GREAT VALLEY CORPORATE CENTER
MALVERN PA 19355
(610) 261-0880PLAZA 1000
SUITE 600
EVEDALE AND REEDMAN ROADS
WOODEDGE NJ 08045
(609) 424-0888800 DELAWARE AVENUE
P. O. BOX 1800
WILMINGTON DE 19808
(302) 224-11001801 L STREET, N. W.
SUITE 700
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(202) 223-7800TWENTY-FIRST FLOOR
227 PARK AVENUE
NEW YORK NY 10017
(212) 251-2200ORIGINAL
7/8/89

DIAL DIRECT (610)

972-7171

February 6, 1989

VIA TELECOPYMr. Larry Falkin
U.S. EPA (3 RC22)
41 Chestnut Building
Philadelphia, PA 19107Re: Metro Container Scope of Work

Dear Larry:

Per our discussion, enclosed please find our proposed scope of work. Representatives of our technical committee and Mike Budin are prepared to discuss this material at your convenience. Please contact Nancy Kilbourn (977-3874) or me to make arrangements.

Thank you for your cooperation.

Sincerely,



Carl B. Everett

CBE:tr
Enclosure
cc: Metro PRP Group
Mr. Michael Budin

Received from
OSC Fax 2/8/89

AR100229

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(Red)

METRO CONTAINER

SCOPE OF WORK

The tasks set forth below are intended to address those aspects of the Metro Container site which represent a threat to public health by way of direct contact. Groundwater considerations are addressed to the extent that surface activities remove the potential for contamination. ^{when the contamination has occurred?} As used throughout this Scope of Work, the terms "disposal" and "dispose" refer to removal from the site and disposal in accordance with applicable federal and state regulations.

The proposed tasks are as follows:

1. Drain the concrete tank (lagoon) and secondary containment area around the tank of all waste materials and cut and plug all piping and drain connections to the tank. Clean the tank and line with an impervious membrane. Fill the tank with an appropriate material (soil, sand, etc.), cap with clay and/or an impervious membrane, and cover with top soil and vegetation. Dispose of all liquids and sludges.
2. All drums on site will be visually inspected to determine both the nature and composition of the contents. This includes both the drums which are currently assumed to contain waste sludges and those assumed to be empty. This also includes all the drums in the drum recycling plant and loading dock, which will be relocated from the building to

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the west side of the property and handled in the same manner as the other drums currently on the site.

All RCRA empty drums, determined by the visual inspection, will be removed from the site and properly disposed or recycled.

Those drums which contain waste materials will be sampled using a statistically based random sampling plan. The samples will be analyzed for screening parameters to determine the nature of the waste, hazardous characteristics and compatibility for bulking. Compatible materials will be bulked, and all wastes and ^{emptied} drums will be disposed.

3. All of the storage tanks and roll-off containers on site will be sampled and the contents analyzed for screening parameters. Compatible materials from the tanks will be bulked, and all wastes will be disposed. The tanks will be emptied, cleaned, dismantled and removed from the site for disposal or recycling. The roll-off containers will be removed for disposal of their contents. The storage tanks include both those tanks containing sludge and those containing the raw materials for the drum cleaning process (acid, caustic, fuel oil, etc.).

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4. The insulation on all externally insulated tanks will be sampled and analysed for asbestos. Any insulation containing asbestos will be properly removed and disposed.
5. Dispose of all pooled liquids in the tank containment areas and in the drum storage areas.
6. All visibly contaminated and stained soil will be scraped and disposed. To prevent direct contact from any remaining contamination, the remaining soil will be graded and topped with an appropriate cover material (top soil, stones, vegetation, etc.).

how deep

deadlines - ?

- + what levels of protection
- + what safety plans ours? their own?

+ when we will be working
no asbestos presence
potential 12/88

Building
demolition
poor condition

- + when
- + by whom < 40 hr. training? experience
- + under whose direction
- + in what order
- + will they assume security during project
- + what about east side of property how will that be addressed.
- + piping investigation from building to tanks via underground lines.
- + what type of cleaning solus + how will they be disposed of.

Disposal option
incineration, recycling,
etc.

AR100232



53 Haddonfield Road, Cherry Hill, NJ 08002 • (609) 482-0222

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-7367

MEMORANDUM

TO: Douglas Fox, OSC, U.S. EPA Region III
Western Response and Oil Preparedness Section TDD# 8810-48B
PCS# 2163

THRU: Terry Briggs, TATL, Region III TTB/91
Mrinal Biswas, Group Leader, TAT Region III

FROM: Rita Sammons, TAT Region III Q8

SUBJECT: Disposal Options for the Metro Container Site,
Trainer, Delaware County, PA

DATE: January 3, 1989

The Metro Container Site is a two acre site which has been the subject of a CERCLA Removal Action begun in September 1988. The site is located in a residential neighborhood in Trainer, Delaware County, Pennsylvania, adjacent to the BP Refinery and to Stoney Creek, a tributary of the Delaware River. Threats at the site include 2,500 drums, a 180,000 gallon lagoon and its 25,000 gallon secondary containment, all of which are filled with sludge that is characteristic of sludge waste from the petroleum and paint industries. The lagoon is three phase: an oily layer of debris, a water phase and a heavy oil sludge layer.

Stabilization measures taken at the site include fencing to control access to the site and building a retaining wall to prevent catastrophic release of waste material into Stoney Creek. Upon receipt of additional funding, cleanup actions will concentrate on removing the threat posed by potential overflow of the lagoon and its secondary containment. In anticipation of this, the Roy F. Weston Technical Assistance Team (TAT) investigated seven options for lagoon disposal at the Metro Container Site. These options address disposal of each of the three layers of the lagoon individually, due to the differences in the nature of the layers. The options were researched through interviews with technical representatives of disposal companies which specialize in handling sludge waste characteristic of the petroleum and paint industries.

The seven options are summarized below:

- 1) Fuel-blending - Oily sludge is blended with other flammable wastes for industrial incineration for power generation. Limitations of this technology include a minimum 5,000 BTU value for the waste, viscosity restrictions, and a maximum water content in the material.
- 2) Water treatment - This option involves solid/liquid separation, treating and discharging liquids and landfilling solids. Restrictions in this technology include maximum discharge contamination levels.

AR100233

Roy F. Weston, Inc.

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION

In Association with ICF Technology, Inc., C.C. Johnson & Malhotra, P.C., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.

- 3) Stabilization - This method requires mixing of sludges with cement or kiln dust and landfilling the entire volume. This option is limited by the land ban to the types of contaminants to be landfilled and by the amount of added material required for stabilization of the sludge.
- 4) Oil recovery - Oil recovery systems usually handle low viscosity materials, primarily liquids. Sludges require solvent extraction of liquids. The cost of processing the semi-solid waste and the additional contamination from chemicals used in this process make oil recovery prohibitive for sludge waste.
- 5) Incineration - Incineration of sludge waste is limited by the pumpability of the material, the EP toxicity of metals in the waste, the cost, and the small quantities that can be accepted in a given time period.
- 6) Bioremediation - On-site bioremediation of petroleum-based sludge waste requires skimming of floatables from the surface of the lagoon, seeding of the material with the organisms, and maintaining the system with aerators, nutrients and waste dredgers. This is a slow and long process. The efficiency of the system is directly related to the optimum temperature variation of the liquid. Growth of the organisms would only be possible in the summer months in this climate.
- 7) Sludge dewatering - There are several types of presses used in dewatering operations, but neither of the two most common, belt and filter presses, can handle sludges containing more than a few percent of oil. Chemicals that are added to oily sludges increase the cost of dewatering by 25 to 50 percent.

Several options have been eliminated by default. The sludge at Metro has a high oil concentration, so sludge dewatering is not applicable. Bioremediation would necessitate cleanup operations to run over two years, which is impractical. The cost of offsite incinerations, up to \$7.00 per gallon, and the limitation of only being able to dispose of 10,000 gallons a week, makes this option undesirable. A mobile incinerator is also undesirable due to the residential neighborhood in which Metro is located. Oil recovery systems cannot be used due to the viscous nature of the sludge.

The remaining options can be used in addressing disposal of the three layers of the lagoon. The top layer, the oil/debris layer, can be skimmed and fuel-blended. This oily material should meet or exceed the minimum BTU requirement and its viscosity should be low enough to allow pumping of the material.

AR100234

Disposal Options for the Metro Container Site
Trainer, Delaware County, PA
January 3, 1989
Page Three

The second layer, the oil-contaminated water phase can be easily treated since the amount of contamination in this phase is low. The bottom layer, the heavy s'udge layer, will probably require stabilization and landfilling, although some of the layer may be suitable for fuel-blending. The amount of material to be stabilized and landfilled should be minimized for minimal environmental impact and maximum cost-effectiveness.

TAT recommends these steps be taken as soon as additional funding becomes available, as conditions at the site have eroded considerably since the first stabilization steps were undertaken September of 1988.

AR100235

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440



B/L Number <u>P28858</u> Date <u>12-8-88</u> Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.		STRAIGHT BILL OF LADING NON NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300694	
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.					
DATE OF PICKUP <u>12-8-88</u>		EPA IDENTIFICATION CODE NO. _____		Non Regulated material	
GENERATOR <u>Metro Container Site</u>		USEPA REGION <u>III</u>		ADDRESS _____	
CITY <u>Traienr</u>		STATE <u>PA</u>		ZIP <u>19013</u> PHONE <u>302 834 1000</u>	
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>		ADDRESS _____	
CONSIGNED TO <u>WASTE CONVERSION INC.</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>		CITY <u>HATFIELD</u> STATE <u>PA</u> ZIP <u>19440</u> PHONE <u>215-822-6996</u>	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL					
PRINT NAME _____		SIGNATURE _____		DATE _____	
TOTAL No. and Types Cont.		E.P.A. Description or D.O.T. Shipping Name		Hazard Class	
1 T/T		Waste Oil Contaminated Water		Non DOT Regulated Material	
				Weight Volume <u>5,117 gal</u>	
QTY	LAB CODE CLIN NO	QTY	LAB CODE CLIN NO	QTY	LAB CODE CLIN NO
	<u>LB13457</u>				
Contact: Jack Wilson					
SPECIAL HANDLING INSTRUCTIONS/COMMENTS A NON HAZARDOUS WASTE (Contract No. _____) PER SUB PART C D PART 261 40 CFR				PLACARDS PROVIDED/AFFIXED 1. Drive Safely 2. _____	
EMERGENCY INFORMATION!!! Call Generator, (print) <u>Metro Container Site</u> USEPA REGION <u>III</u>				CALL: CHEMTREX 800-424-9300 Phone No. A/C <u>302 834 1000</u>	
GENERATOR CERTIFICATION: I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted. Print Name <u>DOUGLAS P FOX</u> Signature <u>[Signature]</u> Date Shipped <u>12-8-88</u>					
TRANSPORTER COMPANY <u>WASTE CONVERSION INC.</u> ADDRESS <u>2869 SANDSTONE DRIVE</u>		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
CITY <u>HATFIELD</u> STATE <u>PA</u> ZIP <u>19440</u> PHONE <u>215-822-6996</u>		This is to certify acceptance of the above described waste for transportation.			
PRINT NAME <u>VINCENT MUMFORD</u>		SIGNATURE <u>[Signature]</u>		DATE <u>12-8-88</u>	
DEPARTED _____		ARRIVE WASTE CONVERSION _____		TOTAL DELAY TIME <u>1 1/2 Hr</u>	
ARRIVAL AT CUSTOMER _____		REASON FOR DELAY <u>SUCKING OIL + LUBED</u>		WITH ABOUT <u>150 FT OF HOSE</u>	
STARTED LOADING _____		TRACTOR NO. <u>33</u>		TRAILER NO. <u>1050</u>	
END LOADING _____					
DEPARTED CUSTOMER _____					

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

AR100236

FORM #102 A

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440

BL Number P25950 Date _____

Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.

**STRAIGHT
BILL OF LADING
NON NEGOTIABLE**

COMMONWEALTH OF PENNSYLV.
DEPT. OF ENVIRONMENTAL RESOUR.
BUREAU OF SOLID WASTE MANAGEMEN.
PROCESSING FACILITY
PERMIT NO. 300694

The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.

DATE OF PICKUP _____ EPA IDENTIFICATION CODE NO. Non Regulated Material
GENERATOR Metro Container Site USEPA Region III ADDRESS _____
CITY Trainer STATE PA ZIP 19013 PHONE 302 834 1000

CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY EPA IDENTIFICATION CODE NO. PAD085690592
CONSIGNED TO WASTE CONVERSION INC. ADDRESS 2869 SANDSTONE DRIVE
CITY HATFIELD STATE PA ZIP 19440 PHONE 215-822-8996

THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL
PRINT NAME Robert J. McNamee SIGNATURE Robert J. McNamee DATE 12/1/88

TOTAL No. and Types Cont.	E.P.A. Description or D.O.T. Shipping Name	Hazard Class	Weight Volume
1T/T	Waste oil contaminated water	non DOT Regulated Material	5000

LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	QTY
1213457					

Contact: Jack Wilson

SPECIAL HANDLING INSTRUCTIONS/COMMENTS A NON HAZARDOUS WASTE
(Contract No. _____) PER 40 CFR PART 261

PLACARDS PROVIDED/AFFIXED

1. Drive Safely

DRIVERS SIGNATURE

2. _____

X

EMERGENCY INFORMATION!!!

Call Generator, (print) Metro Container Site USEPA Region III

CALL: CHEMTREX 800-424-9300

Phone No. A/C 302 834 1000

GENERATOR CERTIFICATION:

I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted.

Print Name Robert J. McNamee Signature Robert J. McNamee Date Shipped _____

TRANSPORTER
COMPANY WASTE CONVERSION INC. ADDRESS 2869 SANDSTONE DRIVE
CITY HATFIELD STATE PA ZIP 19440 PHONE 215-822-8996

EPA IDENTIFICATION CODE NO. PAD085690592

This is to certify acceptance of the above described waste for transportation.

PRINT NAME _____ SIGNATURE _____ DATE _____

	A.M.	P.M.		A.M.	P.M.
DEPARTED _____			ARRIVE WASTE CONVERSION _____		
ARRIVAL AT CUSTOMER _____			TOTAL DELAY TIME _____		
STARTED LOADING _____			REASON FOR DELAY _____		
END LOADING _____					
DEPARTED CUSTOMER _____			TRACTOR NO. _____		
			TRAILER NO. _____		

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

AR100237

FORM #102 A

1988
198615

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440



Number <u>P28856</u> Date <u>12-9-98</u>		STRAIGHT BILL OF LADING NON NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300894	
Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.					
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.					
DATE OF PICKUP <u>12-9-98</u>		EPA IDENTIFICATION CODE NO. <u>Non Regulated material</u>			
GENERATOR <u>Metro Container Site</u>		USEPA REGION <u>III</u>		ADDRESS <u></u>	
CITY <u>Trainer</u>		STATE <u>PA</u>		ZIP <u>19013</u> PHONE <u>302 834 1000</u>	
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY <u>WASTE CONVERSION INC.</u>		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>	
CITY <u>HATFIELD</u>		STATE <u>PA</u>		ZIP <u>19440</u> PHONE <u>215-822-8996</u>	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL					
PRINT NAME <u></u>		SIGNATURE <u></u>		DATE <u></u>	
TOTAL No. and Types Cont.		E.P.A. Description or D.O.T. Shipping Name		Hazard Class	
1 T/T		Waste Oil contaminated water		Non DOT Regulated Material	
5145 gib					
QTY	LAB CODE - CLIN NO.	QTY	LAB CODE - CLIN NO.	QTY	LAB CODE - CLIN NO.
	LB13457				
Contact: Jack Wilson					
SPECIAL HANDLING INSTRUCTIONS/COMMENTS A NON HAZARDOUS WASTE (Contract No. <u></u>) PER 40 CFR PART 261				PLACARDS PROVIDED/AFFIXED Drive Safely 2. <u></u>	
EMERGENCY INFORMATION!!! Call Generator, (print) <u>Metro Container Site</u> USEPA REGION <u>III</u>				CALL: CHEMTREX 800-424-9300 Phone No. A/C <u>302 834 1000</u>	
GENERATOR CERTIFICATION: I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted. Print Name <u>DOUGLAS P. FOX</u> Signature <u>Douglas P. Fox</u> Date Shipped <u>12-9-98</u>					
TRANSPORTER COMPANY <u>WASTE CONVERSION INC.</u>		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
ADDRESS <u>2869 SANDSTONE DRIVE</u>					
CITY <u>HATFIELD</u> STATE <u>PA</u> ZIP <u>19440</u> PHONE <u>215-822-8996</u>					
This is to certify acceptance of the above described waste for transportation.					
PRINT NAME <u>Bobby Boubier</u>		SIGNATURE <u>Bobby Boubier</u>		DATE <u>12-9-98</u>	
DEPARTED <u>9:25</u> A.M. <u></u> P.M.		ARRIVE WASTE CONVERSION <u>11:00</u> A.M. <u></u> P.M.			
ARRIVAL AT CUSTOMER <u>11:00</u>		TOTAL DELAY TIME <u>17 min</u>			
STARTED LOADING <u>12:55</u>		REASON FOR DELAY <u>Waiting For Generator To</u>			
END LOADING <u>12:55</u>		<u>COME So I could load</u>			
DEPARTED CUSTOMER <u>1:45</u>		TRACTOR NO. <u>WC-12</u>		TRAILER NO. <u>15-1-0</u>	

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

AR100238 FORM #102 A

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440



B/L Number <u>P31 586</u> Date <u>2/20/89</u>		STRAIGHT BILL OF LADING NON NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300694	
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.					
DATE OF PICKUP <u>2/20/89</u>		EPA IDENTIFICATION CODE NO. <u>Non Regulated Material</u>			
GENERATOR <u>Metro Container Site</u>		USEPA Reg ion <u>III</u> ADDRESS <u></u>			
CITY <u>Trainer</u>		STATE <u>PA</u>		ZIP <u>19013</u> PHONE <u>302 834 1000</u>	
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
CONSIGNED TO <u>WASTE CONVERSION INC.</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>			
CITY <u>HATFIELD</u>		STATE <u>PA</u>		ZIP <u>19440</u> PHONE <u>215-822-8996</u>	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL					
PRINT NAME <u></u>		SIGNATURE <u></u>		DATE <u></u>	
TOTAL No. and Types Cont.		E.P.A. Description or D.O.T. Shipping Name		Hazard Class	
1 T/T		Waste Oil contaminated water		Non DOT Regulated Material	
Weight Volume		5,500g			
ITY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.
17/1	LB13457				
Contact: Jack Wilson					
SPECIAL HANDLING INSTRUCTIONS/COMMENTS <u>A NON HAZARDOUS WASTE</u>					
(Contract No. <u></u>) PER 40 CFR PART 261					
PLACARDS PROVIDED/AFFIXED				DRIVER'S SIGNATURE	
1. Drive safely				X <u>[Signature]</u>	
2. <u></u>					
EMERGENCY INFORMATION!!!					
Call Generator, (print) <u>Metro Container Site USEPA Region III</u> Phone No. A/C <u>302 834 1000</u>					
CALL: CHEMTREX 800-424-9300					
GENERATOR CERTIFICATION:					
I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted.					
Print Name <u>DOUGLAS P. FOX</u>		Signature <u>[Signature]</u>		Date Shipped <u>2/20/89</u>	
TRANSPORTER		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
COMPANY <u>WASTE CONVERSION INC.</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>			
CITY <u>HATFIELD</u>		STATE <u>PA</u>		ZIP <u>19440</u> PHONE <u>215-822-8996</u>	
This is to certify acceptance of the above described waste for transportation.					
PRINT NAME <u>GARY PEDERSON</u>		SIGNATURE <u>[Signature]</u>		DATE <u>2/20/89</u>	
DEPARTED <u>630</u>		AM P.M.		ARRIVE WASTE CONVERSION	
ARRIVAL AT CUSTOMER <u>800</u>				TOTAL DELAY TIME	
ARTED LOADING <u>800</u>				REASON FOR DELAY <u>None</u>	
END LOADING <u>910</u>					
DEPARTED CUSTOMER <u>915</u>				TRACTOR NO. <u>40</u> TRAILER NO. <u>1450</u>	

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

FORM #102 A

AR100239

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440



B/L Number <u>P31587</u> Date <u>20 Feb 89</u>		STRAIGHT BILL OF LADING NON NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300894	
Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.					
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.					
DATE OF PICKUP <u>20 Feb 89</u>		EPA IDENTIFICATION CODE NO. <u>Non Regulated material</u>			
GENERATOR <u>Metro Container Site USEPA Region III</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>			
CITY <u>Trainer</u>		STATE <u>PA</u>		ZIP <u>19013</u> PHONE <u>302 834 1000</u>	
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY <u>WASTE CONVERSION INC.</u>		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
ADDRESS <u>2869 SANDSTONE DRIVE</u>					
CITY <u>HATFIELD</u>		STATE <u>PA</u>		ZIP <u>19440</u> PHONE <u>215-822-8996</u>	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL					
PRINT NAME _____		SIGNATURE _____		DATE _____	
TOTAL No. and Types Cont.		E.P.A. Description or D.O.T. Shipping Name		Hazard Class	
1 T/t		Wsaee Oil Contaminated Water		Non DOT Regulated Material	
				Weight Volume <u>3,500 G</u>	
QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.
	<u>LB13457</u>				
Contact: Jack Wilson					
SPECIAL HANDLING INSTRUCTIONS/COMMENTS <u>A NON HAZARDOUS WASTE</u>					
(Contract No. _____) <u>PER 40 CFR PART 261</u>					
				PLACARDS PROVIDED/AFFIXED	
				1 Drive safely	
				2 _____	
				DRIVERS SIGNATURE <u>[Signature]</u>	
EMERGENCY INFORMATION!!!				CALL: CHEMTREX 800-424-9300	
Call Generator, (print) <u>Metro Container Site USEPA Region III</u>				Phone No. A/C <u>302 834 1000</u>	
GENERATOR CERTIFICATION:					
I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted.					
Print Name <u>DOUGLAS P. FOX</u>		Signature <u>Douglas P. Fox</u>		Date Shipped <u>20 Feb 89</u>	
TRANSPORTER		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
COMPANY <u>WASTE CONVERSION INC.</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>			
CITY <u>HATFIELD</u>		STATE <u>PA</u>		ZIP <u>19440</u> PHONE <u>215-822-8996</u>	
This is to certify acceptance of the above described waste for transportation.					
PRINT NAME <u>Randy G. Frederick</u>		SIGNATURE <u>[Signature]</u>		DATE <u>20 Feb 89</u>	
DEPARTED <u>left PRT</u>		A.M. <u>11:45</u> P.M.		ARRIVE WASTE CONVERSION	
ARRIVAL AT CUSTOMER				TOTAL DELAY TIME <u>NO Delay</u>	
STARTED LOADING				REASON FOR DELAY <u>Thank you</u>	
END LOADING					
DEPARTED CUSTOMER					
				TRACTOR NO. <u>35</u> TRAILER NO. <u>1030</u>	

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

AR100240

FORM #102 A

WM-51:REV. 6/87

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ D 9 8 1 1 3 3 1 5 0	Manifest Document No. 8.0.2.8.1	2. Page 1 of 1	Information in the shaded areas is not required by Federal law but is required by State law.	
Generator's Name and Mailing Address Australus Recycling, Inc. PO Box 275 Orangetown, NJ 07032				A. State Manifest Document Number PAB 5548373		
4. Generator's Phone (609) 331-7400				B. State Gen. ID State		
5. Transporter 1 Company Name Waste Conversion, Inc.		6. US EPA ID Number PA 008569059		C. State Trans. ID PA-AH 0139		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (215) 822-8996		
9. Designated Facility Name and Site Address Waste Conversion, Inc. 2069 Harrison Dr. Hillsfield, PA 19440		10. US EPA ID Number PA 008569059		E. State Trans. ID PA-AH		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				F. Transporter's Phone ()		
a. Waste Convertible Liquid MS (oil & water) Convertible Liquid MS 1993 (X728)				12. Containers No. Type	13. Total Quantity Wt/Vol	
b.				14. Unit Wt/Vol	15. Waste No.	
c.						
d.						
J. Additional Descriptions for Materials Listed Above (Include physical state and hazard code)				K. Handling Codes for Wastes Listed Above		
Haz. Code Physical State				Haz. Code Physical State		
a. 1 1 1 1				a. 1 1 1 1		
b. 1 1 1 1				b. 1 1 1 1		
16. Special Handling Instructions and Additional Information Not a RCRA Hazardous Waste New Jersey Special Waste Tab Cont 3000 Waste oil & water						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name KAREN M. FISHER		Signature Karen M Fisher		Month Day Year 10 27 89		
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name JAMES H. COLE		Signature James H. Cole		Month Day Year 10 27 89		
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
i. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Month Day Year 11 02 91		

PAB 5548373

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440

ORIGINAL
(207)

Number <u>P32007</u> Date <u>3/2/89</u>		STRAIGHT BILL OF LADING NON NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300894	
Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.					
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.					
DATE OF PICKUP <u>3/2/89</u>		EPA IDENTIFICATION CODE NO. <u>PAD044545895</u>			
GENERATOR <u>US EPA REGION 111</u>		ADDRESS <u>841 CHESTNUT BLD. METRO CONTAINER SITE</u>			
CITY <u>PHILADELPHIA</u>		STATE <u>PA</u>		ZIP <u>19107</u> PHONE _____	
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY		EPA IDENTIFICATION CODE NO. <u>NJD981133150</u>			
CONSIGNED TO <u>PETROLEUM RECYCLING CO.</u>		ADDRESS <u>CENCO BLVD.</u>			
CITY <u>CLAYTON</u>		STATE <u>NJ</u>		ZIP <u>08312</u> PHONE <u>609-881-7400</u>	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL					
PRINT NAME _____		SIGNATURE _____		DATE _____	
TOTAL No. and Types Cont.		E.P.A. Description or D.O.T. Shipping Name		Hazard Class	
1 T/T		SPENT OIL AND GREASE MIXTURE		NON-REGULATED MATERIAL	
Weight Volume				5,500g	
QTY	LAB CODE - CLIN NO.	QTY	LAB CODE - CLIN NO.	QTY	LAB CODE - CLIN NO.
1 T/T	WC14761				
SPECIAL HANDLING INSTRUCTIONS/COMMENTS <u>NOT A HAZARDOUS WASTE</u>					
(Contract No. _____)		<u>PER SUB PART C,D, PART 261, 40 CFR</u>		PLACARDS PROVIDED/AFFIXED	
				1. <u>DRIVE SAFELY</u>	
				2. <u>0000</u>	
				DRIVERS SIGNATURE <u>[Signature]</u>	
				CALL: CHEMTREX 800-424-9300	
EMERGENCY INFORMATION!!!					
Call Generator, (print) <u>US EPA REGION 111</u>		Phone No. A/C _____			
GENERATOR CERTIFICATION:					
I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted.					
Print Name <u>DOUGLAS R. FOX</u>		Signature <u>[Signature]</u>		Date Shipped <u>3/2/89</u>	
TRANSPORTER		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
COMPANY <u>WASTE CONVERSION INC.</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>			
CITY <u>HATFIELD</u>		STATE <u>PA</u>		ZIP <u>19440</u> PHONE <u>215 822-8996</u>	
This is to certify acceptance of the above described waste for transportation.					
PRINT NAME <u>GARY PROCOSEN</u>		SIGNATURE <u>[Signature]</u>		DATE <u>3/2/89</u>	
DEPARTED _____		AM. <u>640</u> P.M. _____		ARRIVE WASTE CONVERSION	
ARRIVAL AT CUSTOMER _____		AM. <u>645</u> P.M. _____		TOTAL DELAY TIME <u>1 hr</u>	
STARTED LOADING _____		AM. <u>920</u> P.M. _____		REASON FOR DELAY <u>WAITING TO LOAD</u>	
END LOADING _____		AM. <u>1005</u> P.M. _____		<u>TWO UNIT ON SITE LOADING ONE AT</u>	
DEPARTED CUSTOMER _____		AM. <u>1015</u> P.M. _____		TRACTOR NO. <u>40</u> TRAILER NO. <u>7450</u>	

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

FORM #102 B

AR100242

Waste Conversion

INC.

ORIGINAL
(Red)

2869 Sandstone Drive / Hatfield, Penna. 19440

B/C Number <u>P32008</u> Date <u>2 Mar 89</u>		STRAIGHT BILL OF LADING NON NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300694	
Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.					
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.					
DATE OF PICKUP <u>2 Mar 89</u>		EPA IDENTIFICATION CODE NO. <u>PAD044545895</u>			
GENERATOR <u>US EPA REGION 111</u>		ADDRESS <u>841 CHESTNUT BLD. METRO CONTAINER SITE</u>			
CITY <u>PHILADELPHIA</u>		STATE <u>PA</u>		ZIP <u>19107</u> PHONE _____	
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY		EPA IDENTIFICATION CODE NO. <u>NJD981133150</u>			
CONSIGNED TO <u>PETROLEUM RECYCLING CO.</u>		ADDRESS <u>CENCO BLVD.</u>			
CITY <u>CLAYTON</u>		STATE <u>NJ</u>		ZIP <u>08312</u> PHONE <u>609-881-7400</u>	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL					
PRINT NAME _____		SIGNATURE _____		DATE _____	
TOTAL No. and Types Cont.		E.P.A. Description or D.O.T. Shipping Name		Hazard Class	
1 T/T		SPENT OIL AND GREASE MIXTURE		NON-REGULATED MATERIAL	
Weight Volume		5,500 G			
QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.
	WC14761				
SPECIAL HANDLING INSTRUCTIONS/COMMENTS <u>NOT A HAZARDOUS WASTE</u>				PLACARDS PROVIDED/AFFIXED	
(Contract No. _____) PER SUB PART C,D, PART 261, 40 CFR				1. <u>DRIVE SAFELY</u> 2. <u>0000</u>	
EMERGENCY INFORMATION!!!				CALL: CHEMTREC 800-424-9300	
Call Generator, (print) <u>US EPA REGION 111</u>				Phone No. A/C _____	
GENERATOR CERTIFICATION: I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted.					
Print Name <u>DOUGLAS P. FOX</u>		Signature <u>Douglas P. Fox</u>		Date Shipped <u>2 Mar 89</u>	
TRANSPORTER		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
COMPANY <u>WASTE CONVERSION INC.</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>			
CITY <u>HATFIELD</u>		STATE <u>PA</u>		ZIP <u>19440</u> PHONE <u>215 822-8996</u>	
This is to certify acceptance of the above described waste for transportation.					
PRINT NAME <u>Randy G. Frederick</u>		SIGNATURE _____		DATE <u>2 Mar 89</u>	
DEPARTED _____		A.M. <u>6:30</u> P.M. _____		ARRIVE WASTE CONVERSION _____	
ARRIVAL AT CUSTOMER _____		A.M. _____ P.M. _____		TOTAL DELAY TIME <u>10 min</u>	
ARTED LOADING _____		A.M. _____ P.M. _____		REASON FOR DELAY <u>lay Hose + get end to lagoon</u>	
ND LOADING _____		A.M. _____ P.M. _____		TRACTOR NO. <u>35</u> TRAILER NO. <u>1350</u>	
DEPARTED CUSTOMER _____		A.M. _____ P.M. _____			

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITYYellow - RETURN TO GENERATOR
Pink - BILLING FILE

FORM #102 B

AR100243



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

ORIGINAL
(Red)

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039 Expires 3-31-85

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No	Manifest Document No	2. Page 1 of	Information on the manifest is not required by State law
3. Generator's Name and Mailing Address				A. State Manifest Document Number NJA 0601885	
4. Generator's Phone				B. State Generator's ID SAME	
5. Transporter 1 Name				C. State Trans ID NJ062306236	
6. Transporter 1 Company Name				D. Transporter's Phone 215 422 3011	
7. Designated Facility Name and Site Address				E. State Trans ID	
8. US EPA ID Number				F. Transporter's Phone	
9. US EPA ID Number				G. State Facility's ID	
10. US EPA ID Number				H. Facility's Phone 609 481 7400	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers	
HM				No	Type
a. HAZARDOUS WASTE					
b. HAZARDOUS WASTE					
c. HAZARDOUS WASTE					
d. HAZARDOUS WASTE					
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above	
OIL AND GREASE 80-90% WATER 10-20% SOIL 12 99%				1 2 3 4	
a. HC14761				b. 1 2 3 4	
b. HC14761				c. 1 2 3 4	
15. Special Handling Instructions and Additional Information				CERTIFICATE OF DISPOSAL REQUIRED	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name WILLIAM R. FOX				Signature William R. Fox	
17. Transporter 1 Acknowledgement of Receipt of Materials				Month Day Year	
Printed/Typed Name				Signature	
18. Transporter 2 Acknowledgement of Receipt of Materials				Month Day Year	
Printed/Typed Name				Signature	
19. Discrepancy Indication Space				AR100244	
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19					
Printed/Typed Name				Signature	

Case type or print in block letters. (Form designed for use on elite (12-pitch) typewriter)

Form Approved OMB No. 0704-0188

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No.		2 Page 1 of 1	
3 Generator's Name and Mailing Address				4 State Manifest Document No. NJA 0601886	
5 Generator's Phone				6 State Generator's ID SAME	
7 Transporter 1 Company Name		8 US EPA ID Number		9 State Trans. Document No. 0601886	
10 Transporter 2 Company Name		11 US EPA ID Number		12 Transporter's Phone 609-392-2903	
13 Designated Facility Name and Site Address		14 US EPA ID Number		15 State Trans. ID	
				16 Transporter's Phone	
				17 State Facility's ID	
				18 Facility's Phone 609-451-7400	
19 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM				20 Containers	
				No.	Type
a					
b					
c					
d					
21 Additional Descriptions for Materials Listed Above OIL AND GREASE 80-90% WATER 10-20% SOIL 1% a TWC14761				22 Handling Codes for Wastes Listed Above S01 T01 F01 T01 a Disposal Unit	
b				c	
d				e	
23 Special Handling Instructions and Additional Information					
24 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway, according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree that is economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and use the best waste management method that is available to me and that I can afford.					
25 Printed/Typed Name MICHAEL R. FOX		26 Signature [Signature]		27 Month/Day/Year 03/03/97	
28 TRANSPORTER 1 Acknowledgement of Receipt of Materials					
29 Printed/Typed Name Randy G. Frederick		30 Signature [Signature]		31 Month/Day/Year 03/03/97	
32 TRANSPORTER 2 Acknowledgement of Receipt of Materials					
33 Printed/Typed Name		34 Signature		35 Month/Day/Year	
36 Discrepancy Indication Space					
37 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19					
38 Printed/Typed Name		39 Signature		40 Month/Day/Year	

ENROSERV, INC.

P. O. BOX 489, CENCO BOULEVARD, CLAYTON, NJ 08312
(609) 881-8080

ORIGINAL

Manifest Number _____ Date <u>3/3/89</u>		STRAIGHT BILL OF LADING NON NEGOTIABLE	
Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.			
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.			
DATE OF PICKUP <u>3/3/89</u>		EPA IDENTIFICATION CODE NO. <u>PAD044545895</u>	
GENERATOR <u>METRO CONTAINER</u>		ADDRESS <u>PO BOX A</u>	
CITY <u>TRANEER</u>		STATE <u>PA</u> ZIP <u>19066</u> PHONE <u>215-455-6100</u>	
CONSIGNEE/TREATMENT/STORAGE/ DISPOSAL FACILITY		EPA IDENTIFICATION CODE NO. <u>PAD085670392</u>	
CONSIGNED TO <u>WASTE CONVERSION, INC.</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>	
CITY <u>HATFIELD</u>		STATE <u>PA</u> ZIP <u>19440</u> PHONE <u>215-822-8996</u>	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL			
SIGNATURE _____		PRINT NAME _____ DATE <u>3/3/89</u>	
No. and Types Cont.	E.P.A. Description or D.O.T. Shipping Name	Hazard Class	Weight Volume
<u>01</u>	<u>WASTE PIT SLUDGE</u>	<u>NON-REGULATED</u>	<u>5,000</u>
<u>TT</u>	<u>NON-REGULATED MATERIAL</u>	<u>MATERIAL</u>	
SPECIAL HANDLING INSTRUCTIONS/COMMENTS		PLACARDS PROVIDED/AFFIXED	
Lab Code No. <u>2905</u>		1. <u>Drive</u> 2. <u>9245/1</u>	
EMERGENCY INFORMATION!!!		DRIVERS SIGNATURE _____	
Call Generator, (print) <u>METRO CONTAINER</u>		Phone No. AC <u>215-455-6100</u>	
I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation.			
Generator Certification <u>For EPA</u>		Printed Name <u>ROBERT GUARNI</u> Date Shipped _____	
TRANSPORTER		EPA IDENTIFICATION CODE NO. <u>PAD085670392</u>	
COMPANY <u>WASTE CONVERSION</u>		ADDRESS <u>2869 SANDSTONE DR</u>	
CITY <u>HATFIELD</u> STATE <u>PA</u> ZIP <u>19440</u>		PHONE <u>215-822-8996</u>	
This is to certify acceptance of the above described waste for transportation.			
SIGNATURE _____		PRINT NAME <u>Jim McLane</u> DATE <u>2-3-89</u>	
TRACTOR <u>60</u>		TRAILER <u>1610</u> DRIVER <u>Mac</u>	
DEPARTED _____		ARRIVE WASTE CONVERSION _____	
ARRIVAL AT CUSTOMER _____		TOTAL DELAY TIME _____	
STARTED LOADING _____		REASON FOR DELAY _____	
END LOADING _____		AUTHORIZED SIGNATURE _____	
DEPARTED CUSTOMER _____			

AR100246



PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES
Bureau of Waste Management
P. O. Box 2063
Harrisburg, PA 17120

ER-SWM-51-REV. 8/87

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

1250
ORIGINAL
(Red)

Form approved.
OMB No. 2050-0039
Expires 9-30-89

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. P-1-0-0-4-5-4-5-8-9-5		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law but is required by State law.	
Generator's Name and Mailing Address 113 EPA 201 III P.O. Box 113 Philadelphia, PA 19106 (215) 597-8998						A. State Manifest Document Number PAB 4755936			
4. Generator's Phone 215-597-8998						B. State Gen. ID None			
5. Transporter 1 Company Name P.O. Box 113						6. US EPA ID Number P-1-0-0-8-5-6-1-0-5-9-2		C. State Trans. ID PA-AH 10159	
7. Transporter 2 Company Name						8. US EPA ID Number		D. Transporter's Phone 215-822-8996	
9. Designated Facility Name and Site Address						10. US EPA ID Number		E. State Trans. ID PA-AH	
						F. Transporter's Phone ()		G. State Facility's ID Not Required	
						H. Facility's Phone ()			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity	
a. 113 EPA 201 III Hazardous Material						001 T.T		05500 G	
b. RECEIVED									
c. MAR 14 1989									
d. REGION III									
14. Additional Descriptions for Materials Listed Above (Include physical state and hazard code)						K. Handling Codes for Wastes Listed Above			
a. Haz. Code Physical State 2905						b. T-40 S-02 T-45			
c. Haz. Code Physical State						d.			
15. Special Handling Instructions and Additional Information									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name P. FAX						Signature [Signature]		Month Day Year 03 03 89	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name Michael Rehor						Signature [Signature]		Month Day Year 03 03 89	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name						Signature		Month Day Year	
19. Discrepancy Indication Space						H-215-822-8996 15 state No discrepancy 3-7-89 pd			
Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.									
Printed/Typed Name						Signature [Signature]		Month Day Year 03 03 89	

PAB 4755936

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440



Number <u>P32139</u> Date <u>3-3-89</u>		STRAIGHT BILL OF LADING NON NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300694	
Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.					
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.					
DATE OF PICKUP _____		EPA IDENTIFICATION CODE NO. <u>PAD044545895</u>			
GENERATOR <u>Metro Container</u> <u>SIR US EPA</u>		ADDRESS <u>P O Box A</u>			
CITY <u>Trainer</u>		STATE <u>PA</u> ZIP <u>19016</u>		PHONE <u>215 485 6100</u>	
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY <u>WASTE CONVERSION INC.</u>		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
CONSIGNED TO <u>HATFIELD</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>			
CITY <u>HATFIELD</u>		STATE <u>PA</u> ZIP <u>19440</u>		PHONE <u>215-822-8996</u>	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL					
PRINT NAME _____		SIGNATURE _____		DATE _____	
TOTAL No. and Types Cont. <u>1 T/T</u>		E.P.A. Description or D.O.T. Shipping Name <u>Waste Pit Sludge (water)</u>		Hazard Class <u>Non Regulated Material</u>	
				Weight Volume <u>5,000 gal</u>	
Y	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.
	<u>2905</u>				
Contact: <u>Butler DOTAG FOX</u>					
SPECIAL HANDLING INSTRUCTIONS/COMMENTS <u>A NON HAZARDOUS WASTE</u>					
(Contract No. _____) PER 40 CFR PART 261					
PLACARDS PROVIDED/AFFIXED			DRIVERS SIGNATURE		
1. <u>Drive Safely</u>			<u>[Signature]</u>		
2. _____			_____		
EMERGENCY INFORMATION!!!					
Call Generator, (print) <u>Metro Container</u> Phone No. A/C <u>215 485 6100</u>					
GENERATOR CERTIFICATION:					
I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted.					
Print Name <u>DOUGLAS P FOX</u> Signature <u>[Signature]</u> Date Shipped <u>3-3-89</u>					
TRANSPORTER		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
COMPANY <u>WASTE CONVERSION INC.</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>			
CITY <u>HATFIELD</u>		STATE <u>PA</u> ZIP <u>19440</u>		PHONE <u>215-822-8996</u>	
This is to certify acceptance of the above described waste for transportation.					
PRINT NAME <u>Jim McLaren</u>		SIGNATURE <u>[Signature]</u>		DATE <u>3-3-89</u>	
DEPARTED _____		ARRIVE WASTE CONVERSION _____		A.M. P.M.	
ARRIVAL AT CUSTOMER <u>2:40</u>		TOTAL DELAY TIME _____		A.M. P.M.	
RTED LOADING <u>2:10</u>		REASON FOR DELAY _____		A.M. P.M.	
LO LOADING <u>2:40</u>		TRACTOR NO. _____		TRAILER NO. _____	
DEPARTED CUSTOMER <u>2:50</u>					

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

FORM #102 A

AR100248

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440



Number P32054 Date _____		STRAIGHT BILL OF LADING NON NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300694	
Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.					
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.					
DATE OF PICKUP _____		EPA IDENTIFICATION CODE NO. PAD044545895			
GENERATOR Metro Container SITE US EPA		ADDRESS P O Box A			
CITY Trainer		STATE PA		ZIP 19016 PHONE 215 485 6100	
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY WASTE CONVERSION INC.		EPA IDENTIFICATION CODE NO. PAD085690592			
CONSIGNEE TO HATFIELD		ADDRESS 2869 SANDSTONE DRIVE			
CITY HATFIELD		STATE PA		ZIP 19440 PHONE 215-822-8996	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL					
PRINT NAME _____		SIGNATURE _____		DATE _____	
TOTAL No. and Types Cont.		E.P.A. Description or D.O.T. Shipping Name		Hazard Class	
1 T/T		Waste Pit Sludge sludge from drum washing		Non Regulated material	
				Gals 4,500	
QTY	LAB CODE - CLIN NO.	QTY	LAB CODE - CLIN NO.	QTY	LAB CODE - CLIN NO.
	2905				
Contact: Jerry Butler					
SPECIAL HANDLING INSTRUCTIONS/COMMENTS A NON HAZARDOUS WASTE				PLACARDS PROVIDED/AFFIXED	
(Contract No. _____) EPR 40 CFR PART 261				1 Drive Safely	
				2. _____	
EMERGENCY INFORMATION!!!				CALL: CHEMTREX 800-424-9300	
Call Generator, (print) Metro container				Phone No. A/C 215 485 6100	
GENERATOR CERTIFICATION: I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are as noted.					
Print Name DOUGLAS R. FOX		Signature Douglas R. Fox		Date Shipped 3-3-89	
TRANSPORTER WASTE CONVERSION INC.		EPA IDENTIFICATION CODE NO. PAD085690592			
COMPANY HATFIELD		ADDRESS 2869 SANDSTONE DRIVE			
CITY HATFIELD		STATE PA		ZIP 19440 PHONE 215-822-8996	
This is to certify acceptance of the above described waste for transportation.					
PRINT NAME Calvin Hanley		SIGNATURE Calvin Hanley		DATE 3/3/89	
DEPARTED _____		ARRIVE WASTE CONVERSION _____			
ARRIVAL AT CUSTOMER _____		TOTAL DELAY TIME _____			
STARTED LOADING _____		REASON FOR DELAY _____			
END LOADING _____					
DEPARTED CUSTOMER _____		TRACTOR NO. _____		TRAILER NO. _____	

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

FORM #102 A

AR100249

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440



Number **P32134**

Date **3-04-89**

**STRAIGHT
BILL OF LADING
NON NEGOTIABLE**

COMMONWEALTH OF PENNSYLVANIA
DEPT. OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT
PROCESSING FACILITY
PERMIT NO. 300694

Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.

The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, by its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.

DATE OF PICKUP **3-04-89** EPA IDENTIFICATION CODE NO. **PAD044545895**
GENERATOR **Metro Container** ADDRESS **P O Box A**
CITY **Trainer** STATE **PA** ZIP **19016** PHONE **215 485 6100**

CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY EPA IDENTIFICATION CODE NO. **PAD085690592**
CONSIGNEE **WASTE CONVERSION INC.** ADDRESS **2869 SANDSTONE DRIVE**
CITY **HATFIELD** STATE **PA** ZIP **19440** PHONE **215-822-8996**

THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL

PRINT NAME _____ SIGNATURE _____ DATE _____

TOTAL No. and Types Cont.	E.P.A. Description or D.O.T. Shipping Name	Hazard Class	Weight Volume
1 T/T	Waste Pit Sludge (water)	Non Regulated Material	5,500 9/11/05

QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	
5,500	2950					Contact: Butler

SPECIAL HANDLING INSTRUCTIONS/COMMENTS **NON HAZARDOUS WASTE**
(Contract No. _____) PER 40 CFR PART 261

PLACARDS PROVIDED/AFFIXED

Drive safely
2. _____

DRIVERS SIGNATURE

X **Dean Meyer**

EMERGENCY INFORMATION!!!

Call Generator, (print) **Metro container**

CALL: CHEMTREX 800-424-9300
Phone No. A/C **215 485 6100**

GENERATOR CERTIFICATION:

I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted.

Print Name **DOUGLAS P. FOX** Signature **X Douglas P. Fox** Date Shipped **3-04-89**

TRANSPORTER **WASTE CONVERSION INC.** EPA IDENTIFICATION CODE NO. **PAD085690592**
COMPANY **WASTE CONVERSION INC.** ADDRESS **2869 SANDSTONE DRIVE**
CITY **HATFIELD** STATE **PA** ZIP **19440** PHONE **215-822-8996**

This is to certify acceptance of the above described waste for transportation.

PRINT NAME **Dean Meyer** SIGNATURE **Dean Meyer** DATE **3-04-89**

	A.M.	P.M.		A.M.	P.M.
DEPARTED	6:30		ARRIVE WASTE CONVERSION		
ARRIVAL AT CUSTOMER	8:00		TOTAL DELAY TIME	2 Hours 15 minutes	
STARTED LOADING	9:55		REASON FOR DELAY	Load 1040, 1070, 1250, 1060	
END LOADING	10:20			1050 clean-up hoses	
DEPARTED CUSTOMER	11:00		TRACTOR NO.	22	TRAILER NO. 1050

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

FORM #102 A

AR100250

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440



B/L Number <u>P32135</u> Date <u>3-4-89</u>	STRAIGHT BILL OF LADING NON NEGOTIABLE	COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300894
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The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, waterline, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.

DATE OF PICKUP <u>3-4-89</u>	EPA IDENTIFICATION CODE NO. <u>PAD044545895</u>	<u>US EPA REG III 5979886</u>
GENERATOR <u>Metro Container</u>	ADDRESS <u>P O Box A</u>	
CITY <u>Trainer</u>	STATE <u>PA</u> ZIP <u>19016</u>	PHONE <u>215 485 6100</u>

CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY	EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>
CONSIGNEE TO <u>WASTE CONVERSION INC.</u>	ADDRESS <u>2869 SANDSTONE DRIVE</u>
CITY <u>HATFIELD</u>	STATE <u>PA</u> ZIP <u>19440</u> PHONE <u>215-822-8996</u>

THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL

PRINT NAME	SIGNATURE	DATE
------------	-----------	------

TOTAL No. and Types Cont.	E.P.A. Description or D.O.T. Shipping Name	Hazard Class	Weight Volume
1 T/T	Waste Pit Sludge (Water)	Non Regulated Material	5,500

QTY	LAB CODE CLIN NO	QTY	LAB CODE CLIN NO	QTY	LAB CODE CLIN NO	
17/18	2950					Contact: Butler

SPECIAL HANDLING INSTRUCTIONS/COMMENTS	A NON HAZARDOUS WASTE	PLACARDS PROVIDED/AFFIXED
(Contract No. _____) PER 40 CFR PART 261		1. Drive Safely
		2. _____
		X <u>Philip Jones</u>

EMERGENCY INFORMATION!!!	CALL: CHEMTREX 800-424-9300
Call Generator, (print) <u>Metro Container</u>	Phone No. A/C <u>215 485 6100</u>

GENERATOR CERTIFICATION:
I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted.
Print Name <u>Douglas P. Fox</u> Signature <u>Douglas P. Fox</u> Date Shipped <u>3-4-89</u>

TRANSPORTER	EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>
COMPANY <u>WASTE CONVERSION INC.</u>	ADDRESS <u>2869 SANDSTONE DRIVE</u>
CITY <u>HATFIELD</u> STATE <u>PA</u> ZIP <u>19440</u>	PHONE <u>215-822-8996</u>

This is to certify acceptance of the above described waste for transportation.
PRINT NAME <u>Philip Jones</u> SIGNATURE <u>Philip Jones</u> DATE <u>3-4-89</u>

DEPARTED <u>6:00</u> A.M. <u>X</u>	ARRIVE WASTE CONVERSION
ARRIVAL AT CUSTOMER <u>8:00</u> A.M. <u>X</u>	TOTAL DELAY TIME <u>1hr. 45</u>
STARTED LOADING <u>7:15</u> A.M. <u>X</u>	REASON FOR DELAY <u>Loading</u>
END LOADING <u>7:15</u> A.M. <u>X</u>	
DEPARTED CUSTOMER <u>10:45</u> A.M. <u>X</u>	TRACTOR NO. <u>28</u> TRAILER NO. <u>1250</u>

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

ART00251
FORM #102 A

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440



Number <u>P32136</u> Date <u>3/4/89</u>		STRAIGHT BILL OF LADING NON NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300694	
Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.					
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.					
DATE OF PICKUP <u>3/4/89</u>		EPA IDENTIFICATION CODE NO. <u>PAD044545895</u>		GENERATOR <u>Metro Container</u> ADDRESS <u>P O Box A</u> <u>537 9898</u>	
CITY <u>Trainer</u>		STATE <u>PA</u> ZIP <u>19016</u>		PHONE <u>215 485 6100</u>	
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY <u>WASTE CONVERSION INC.</u>		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>	
CITY <u>HATFIELD</u>		STATE <u>PA</u> ZIP <u>19440</u>		PHONE <u>215-822-8996</u>	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL					
PRINT NAME _____		SIGNATURE _____		DATE _____	
TOTAL No. and Types Cont.		E.P.A. Description or D.O.T. Shipping Name		Hazard Class	
1 T/T		Waste Pit Sludge (water)		Non Regulated Material	
Weight Volume		5,000 G			
QTY	LAB CODE - CLIN NO	QTY	LAB CODE - CLIN NO	QTY	LAB CODE - CLIN NO
1 T/T	2950				
Contact: Butler					
SPECIAL HANDLING INSTRUCTIONS/COMMENTS <u>A NON HAZARDOUS WASTE</u>					
(Contract No. _____) PER 40 CFR APRT 261					
PLACARDS PROVIDED/AFFIXED				DRIVERS SIGNATURE	
1. Drive safely				X <u>[Signature]</u>	
2. _____					
EMERGENCY INFORMATION!!!					
Call Generator, (print) <u>Metro Container</u> Phone No. A/C <u>215 485 6100</u>					
CALL: CHEMTREX 800-424-9300					
GENERATOR CERTIFICATION:					
I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correctly noted.					
Print Name <u>DOUGLAS P FOX</u> Signature <u>[Signature]</u> Date Shipped <u>3/4/89</u>					
TRANSPORTER		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
COMPANY <u>WASTE CONVERSION INC.</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>			
CITY <u>HATFIELD</u> STATE <u>PA</u> ZIP <u>19440</u>		PHONE <u>215-822-8996</u>			
This is to certify acceptance of the above described waste for transportation.					
PRINT NAME <u>Douglas Gramm</u>		SIGNATURE <u>[Signature]</u>		DATE <u>3/4/89</u>	
DEPARTED _____		ARRIVE WASTE CONVERSION _____		A.M. P.M.	
ARRIVAL AT CUSTOMER _____		TOTAL DELAY TIME <u>1 hr 45 min</u>			
STARTED LOADING _____		REASON FOR DELAY <u>Assist in maneuvering hose</u>			
END LOADING _____		Sections, Wait for all Trucks to be loaded to			
DEPARTED CUSTOMER _____		TRACTOR NO. <u>29</u>		TRAILER NO. <u>1060</u>	

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

Recover hose sections used from #1060.

FORM #102A

0100252

Waste Conversion

INC.

2869 Sandstone Drive / Hatfield, Penna. 19440

B/L
Number P32137Date 3-4-89STRAIGHT
BILL OF LADING
NON NEGOTIABLE

Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.

COMMONWEALTH OF PENNSYLVANIA
DEPT. OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT
PROCESSING FACILITY
PERMIT NO. 300694

The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself, and his assigns.

DATE OF PICKUP 3-4-89 EPA IDENTIFICATION CODE NO. PAD044545895
GENERATOR Metro Container ADDRESS P O Box A
CITY Trainer STATE PA ZIP 19016 PHONE 215 485 6100

CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY EPA IDENTIFICATION CODE NO. PAD085690592
CONSIGNEE WASTE CONVERSION INC. ADDRESS 2869 SANDSTONE DRIVE
CITY HATFIELD STATE PA ZIP 19440 PHONE 215-822-8996

THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL

PRINT NAME _____ SIGNATURE _____ DATE _____

TOTAL No. and Types Cont.	E.P.A. Description or D.O.T. Shipping Name	Hazard Class	Weight Volume
1 T/T	Waste Pit Sludge (water)	Non Regulated Material	5,000 G

QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	
5000	2950					Contact: Butler

SPECIAL HANDLING INSTRUCTIONS/COMMENTS **A NON HAZARDOUS WASTE**
(Contract No. _____) **PER 40 CFR PART 261**

PLACARDS PROVIDED/AFFIXED

1. Drive Safely	DRIVERS SIGNATURE
2. 0000	X <u>[Signature]</u>

EMERGENCY INFORMATION!!!

CALL: CHEMTREX 800-424-9300

Call Generator, (print) Metro container Phone No. A/C 215 485 6100

GENERATOR CERTIFICATION:

I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted.

Print Name DOUGLAS P. FOX Signature [Signature] Date Shipped 3-4-89

TRANSPORTER
COMPANY WASTE CONVERSION INC. ADDRESS 2869 SANDSTONE DRIVE
CITY HATFIELD STATE PA ZIP 19440 PHONE 215-822-8996

This is to certify acceptance of the above described waste for transportation.

PRINT NAME PAT SCOLL SIGNATURE [Signature] DATE 3-4-89

	A.M.	P.M.		A.M.	P.M.
DEPARTED	6:30		ARRIVE WASTE CONVERSION		
ARRIVAL AT CUSTOMER	8:00		TOTAL DELAY TIME		
STARTED LOADING	8:20		REASON FOR DELAY		
END LOADING	9:00				
DEPARTED CUSTOMER	11:00		TRACTOR NO. <u>36</u>		TRAILER NO. <u>1040</u>

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

FORM #102 A

AR100253

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440



S/L Number <u>P32138</u> Date <u>3-4-89</u> Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.	STRAIGHT BILL OF LADING NON NEGOTIABLE	COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300694
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The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.

DATE OF PICKUP 3-4-89 EPA IDENTIFICATION CODE NO. PADO44545895
 GENERATOR Metro Container U.S. EPA Reg. 12 ADDRESS P O Box A 215 557 9858
 CITY Traienr STATE PA ZIP 19016 PHONE 215 485 6100

CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY EPA IDENTIFICATION CODE NO. PADO85690592
 CONSIGNED TO WASTE CONVERSION INC. ADDRESS 2869 SANDSTONE DRIVE
 CITY HATFIELD STATE PA ZIP 19440 PHONE 215-822-8996

THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL

TOTAL No. and Types Cont.	E.P.A. Description or D.O.T. Shipping Name	Hazard Class	Weight Volume
1 T/T	Waste Pit Sludge (water)	Non Regulated Material	5000

QTY	LAB CODE - CLIN NO.	QTY	LAB CODE - CLIN NO.	QTY	LAB CODE - CLIN NO.
17/1	2950				

Contact: Butler

SPECIAL HANDLING INSTRUCTIONS/COMMENTS A NON HAZARDOUS WASTE
 (Contract No. _____) PER 40 CFR PART 261

PLACARDS PROVIDED/AFFIXED
 1. Drive Safely
 2. _____
 DRIVERS SIGNATURE [Signature]

EMERGENCY INFORMATION!!! CALL: CHEMTREX 800-424-9300
 Call Generator, (print) Metro Container Phone No. A/C 215 485 6100

GENERATOR CERTIFICATION:
 I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are properly noted.
 Print Name: Y. DOUGLAS P. FOX Signature [Signature] Date Shipped 3-4-89

TRANSPORTER EPA IDENTIFICATION CODE NO. PADO85690592
 COMPANY WASTE CONVERSION INC. ADDRESS 2869 SANDSTONE DRIVE
 CITY HATFIELD STATE PA ZIP 19440 PHONE 215-822-8996

This is to certify acceptance of the above described waste for transportation.
 PRINT NAME FREDERICK H. SPEN SIGNATURE [Signature] DATE 3-4-89

	A.M.	P.M.	
DEPARTED <u>6:00</u>	<u>X</u>		ARRIVE WASTE CONVERSION
ARRIVAL AT CUSTOMER <u>8:00</u>	<u>X</u>		TOTAL DELAY TIME <u>2 HRS</u>
STARTED LOADING <u>9:30</u>	<u>X</u>		REASON FOR DELAY <u>3 TRUCKS; LOADING ONLY 2 AT A TIME</u>
END LOADING <u>10:45</u>	<u>X</u>		<u>6-7 LENGTHS OF HOSE STUCK LOADING LOADED 40'</u>
DEPARTED CUSTOMER <u>11:00</u>	<u>X</u>		TRACTOR NO. <u>39</u> TRAILER NO. <u>1030</u>

White - GENERATOR FILE
 Blue - TRANSPORTER FILE
 Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
 Pink - BILLING FILE

FORM #102 A

AR100254

SHIPPING MANIFEST

ORIGINAL (Red)

ORIGIN:

Facility Name: West Coast
Address & Office: _____
City: PA State: PA Zip: _____
Telephone No.: _____

CARRIER:

Facility Name: East Enterprise/Probank
Address: 3209 N. Hill Road
City: Wilmington State: DE Zip: 08360
Telephone No.: (609) 696-6601

DESTINATION:

Facility Name: West Coast
Address: 3869 Sandstone Drive
City: Hartford State: PA Zip: 19440
Telephone No.: _____

NO. OF CONTAINERS	DESCRIPTION OF MATERIAL	QUAN. TITY	DOT HAZARD CLASS	DOT LABEL
1	Non-hazardous, Non-RCRA Regulated Material	1500	N/A	N/A

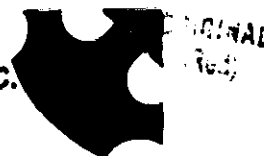
Signature of Originator: EPA
Date: 5/13/89
Carrier Signature: Wm. A. Sullivan
Date: _____

Destination Facility Signature: _____
Date: _____

The purpose of this form is to track the manifested material from point of origin to destination. It is NOT a hazardous waste manifest. AR100255

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440



Number <u>P34441</u> Date <u>5-19-89</u>		STRAIGHT BILL OF LADING NON NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300694	
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.					
DATE OF PICKUP <u>5-19-89</u>		EPA IDENTIFICATION CODE NO. _____		Non Regulated material	
GENERATOR <u>Metro Container Site</u>		USEPA REGION III		ADDRESS _____	
CITY <u>Trainer</u>		STATE <u>PA</u>		ZIP <u>19013</u> PHONE <u>302 834 1000</u>	
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY <u>WASTE CONVERSION INC.</u>		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>		2869 SANDSTONE DRIVE	
CITY <u>HATFIELD</u>		STATE <u>PA</u>		ZIP <u>19440</u> PHONE <u>215-822-8996</u>	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL					
PRINT NAME _____		SIGNATURE _____		DATE _____	
TOTAL No. and Types Cont. _____		E.P.A. Description or D.O.T. Shipping Name _____		Hazard Class _____	
1 T/T		Waste Oil contaminated water		Non DOT Regulated Material	
Weight Volume <u>05200</u> <u>6</u>					
QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.
	<u>LB13457</u>				
Contact: Jack Wilson					
SPECIAL HANDLING INSTRUCTIONS/COMMENTS <u>A NON HAZARDOUS WASTE</u>					
(Contract No. _____) <u>PER 40 CFR PART 261</u>					
PLACARDS PROVIDED/AFIXED				DRIVERS SIGNATURE	
1. <u>Drive Safely</u>				<u>X</u> <u>Rokob</u>	
2. _____				_____	
EMERGENCY INFORMATION!!!					
Call Generator, (print) <u>Metro Container Site USEPA REGION III</u> Phone No. A/C <u>302 834 1000</u>					
CALL: CHEMTREC 800-424-9300					
GENERATOR CERTIFICATION:					
I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all fees and delays are correct as noted.					
Print Name <u>JOAN M HENRY</u> SAO Signature <u>Joan M. Henry</u> Date Shipped <u>5-19-89</u>					
TRANSPORTER					
COMPANY <u>WASTE CONVERSION INC.</u>					
EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>					
2869 SANDSTONE DRIVE					
CITY <u>HATFIELD</u> STATE <u>PA</u> ZIP <u>19440</u> PHONE <u>215-822-8996</u>					
This is to certify acceptance of the above described waste for transportation.					
PRINT NAME <u>Michael Rokob</u> SIGNATURE <u>Michael Rokob</u> DATE <u>5-19-89</u>					
DEPARTED _____		ARRIVE WASTE CONVERSION _____		A.M. P.M.	
ARRIVAL AT CUSTOMER _____		TOTAL DELAY TIME _____		_____	
STARTED LOADING _____		REASON FOR DELAY <u>Delay</u>		_____	
END LOADING _____		<u>37</u>		_____	
DEPARTED CUSTOMER _____		TRACTOR NO. <u>37</u>		TRAILER NO. <u>1080</u>	

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

FORM #102 A

AR100256

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440

ORIGINAL
(Red)

B/L Number P34442 Date 5/19/89
Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.

**STRAIGHT
BILL OF LADING
NON NEGOTIABLE**

COMMONWEALTH OF PENNSYLVANIA
DEPT. OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT
PROCESSING FACILITY
PERMIT NO. 300694

The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.

DATE OF PICKUP 5/19/89 EPA IDENTIFICATION CODE NO. Non Regulated material
GENERATOR Metro Container Site USEPA REGION III ADDRESS
CITY Trainer STATE PA ZIP 19013 PHONE 302 834 1000

CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY EPA IDENTIFICATION CODE NO. PAD085690592
CONSIGNED TO WASTE CONVERSION INC. ADDRESS 2869 SANDSTONE DRIVE
CITY HATFIELD STATE PA ZIP 19440 PHONE 215-822-8996

THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL

PRINT NAME SIGNATURE DATE

TOTAL No. and Types Cont.	E.P.A. Description or D.O.T. Shipping Name	Hazard Class	Weight Volume
1 T/T	Waste Oil Contaminated Water	Non DOT Regulated Material	50006

QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	
	LB13457					Contact: Jack Wilson

SPECIAL HANDLING INSTRUCTIONS/COMMENTS **A NON HAZARDOUS WASTE**
(Contract No.) PER 40 CFR PART 261

PLACARDS PROVIDED/AFFIXED

1. Drive Safely
2.

DRIVERS SIGNATURE

[Signature]

EMERGENCY INFORMATION!!!

Call Generator, (print) Metro Container Site USEPA REGION III Phone No. A/C 302 834 1000

GENERATOR CERTIFICATION:

I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted.

Print Name JOHN M HENRY SMO Signature John M. Henry SMO Date Shipped 5/19/89

TRANSPORTER
COMPANY WASTE CONVERSION INC. ADDRESS 2869 SANDSTONE DRIVE
CITY HATFIELD STATE PA ZIP 19440 PHONE 215-822-8996

This is to certify acceptance of the above described waste for transportation.
PRINT NAME William L. Kossel SIGNATURE [Signature] DATE 5/19/89

Trailers not ready.	0830	✓	A.M.	P.M.
DEPARTED				
ARRIVAL AT CUSTOMER	1000	✓		
STARTED LOADING	1015	✓		
END LOADING	1055	✓		
DEPARTED CUSTOMER	1100	✓		

ARRIVE WASTE CONVERSION

TOTAL DELAY TIME NO Delay

REASON FOR DELAY

TRACTOR NO. 20 TRAILER NO. 1060

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

FORM #102 A

AR100257

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440



DATE
1989

B/L Number P28859 Date 5-19-89		STRAIGHT BILL OF LADING NON NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300894	
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.					
DATE OF PICKUP 5-19-89		EPA IDENTIFICATION CODE NO. Non Regulated Material			
GENERATOR Metro Container Site		USEPA REGION III		ADDRESS Trainer	
CITY Trainer		STATE PA		ZIP 19013 PHONE 302 834 1000	
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY WASTE CONVERSION INC.		EPA IDENTIFICATION CODE NO. PAD085690592			
CONSIGNED TO WASTE CONVERSION INC.		ADDRESS 2869 SANDSTONE DRIVE			
CITY HATFIELD		STATE PA		ZIP 19440 PHONE 215-822-8996	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL					
PRINT NAME		SIGNATURE		DATE	
TOTAL No. and Types Cont.		E.P.A. Description or D.O.T. Shipping Name		Hazard Class	
1 T/T		Waste Oil Contaminated water		Non DOT Regulated Material	
				Weight Volume 550 gal	
QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.
	1 B13457				
Contact: Jack Wilson					
SPECIAL HANDLING INSTRUCTIONS/COMMENTS A NON HAZARDOUS WASTE					
(Contract No.) PER 40 CFR PART 261					
PLACARDS PROVIDED/AFFIXED				DRIVERS SIGNATURE	
1 Drive Safely				x <i>[Signature]</i>	
2					
EMERGENCY INFORMATION!!!					
Call Generator, (print) Metro Container Site USEPA Region III Phone No. A/C 302 834 1000					
CALL: CHEMTREX 800-424-9300					
GENERATOR CERTIFICATION:					
I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted.					
Print Name JOHN M. HENRY SAO Signature <i>[Signature]</i> Date Shipped 5-19-89					
TRANSPORTER					
COMPANY WASTE CONVERSION INC. ADDRESS 2869 SANDSTONE DRIVE					
CITY HATFIELD STATE PA ZIP 19440 PHONE 215-822-8996					
EPA IDENTIFICATION CODE NO. PAD085690592					
This is to certify acceptance of the above described waste for transportation.					
PRINT NAME Bobby Powell		SIGNATURE <i>[Signature]</i>		DATE 5-19-89	
DEPARTED		ARRIVE WASTE CONVERSION			
ARRIVAL AT CUSTOMER		TOTAL DELAY TIME			
STARTED LOADING		REASON FOR DELAY			
END LOADING		TRACTOR NO. WC-32		TRAILER NO. 15510	
DEPARTED CUSTOMER					

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

FORM #102 A

AR100258

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Penna. 19440

INC.




B/L Number <u>P28857</u> Date <u>5/19/89</u> Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.		STRAIGHT BILL OF LADING NON NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300694	
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.					
DATE OF PICKUP <u>5/19/89</u>		EPA IDENTIFICATION CODE NO. <u>Non Regulated material</u>			
GENERATOR <u>Metro Container Site</u>		USEPA REGION <u>II</u>		ADDRESS <u></u>	
CITY <u>Trainer</u>		STATE <u>PA</u>		ZIP <u>19013</u> PHONE <u>302 834 1000</u>	
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY <u>WASTE CONVERSION INC.</u>		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
ADDRESS <u>2869 SANDSTONE DRIVE</u>					
CITY <u>HATFIELD</u>		STATE <u>PA</u>		ZIP <u>19440</u> PHONE <u>215-822-8996</u>	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL					
PRINT NAME <u></u>		SIGNATURE <u></u>		DATE <u></u>	
TOTAL No. and Types Cont. <u>1 T/T</u>		EPA Description or D.O.T. Shipping Name <u>Waste Oil contaminated wa ter</u>		Hazard Class <u>Non DOT Regulated Material</u>	
				Weight Volume <u>5500g</u>	
QTY	LAB CODE - CLIN NO.	QTY	LAB CODE - CLIN NO.	QTY	LAB CODE - CLIN NO.
<u>1 T/T</u>	<u>LB13457</u>				
				Contact: Jack Wilson	
SPECIAL HANDLING INSTRUCTIONS/COMMENTS A NON HAZARDOUS WASTE (Contract No. <u></u>) PER 40 CFR PART 261				PLACARDS PROVIDED/AFFIXED 1. <u>Drive Safely</u> 2. <u></u>	
EMERGENCY INFORMATION!!! Call Generator, (print) <u>Metro Container site USEPA REGION III</u>				CALL: CHEMTREX 800-424-9300 Phone No. A/C <u>302 834 1000</u>	
GENERATOR CERTIFICATION: I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted. Print Name <u>JOHN M HENRY</u> SAO Signature <u>John M. Henry</u> Date Shipped <u>5/19/89</u>					
TRANSPORTER COMPANY <u>WASTE CONVERSION INC.</u>		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
ADDRESS <u>2869 SANDSTONE DRIVE</u>					
CITY <u>HATFIELD</u> STATE <u>PA</u> ZIP <u>19440</u> PHONE <u>215-822-8996</u>					
This is to certify acceptance of the above described waste for transportation.					
PRINT NAME <u>John H. Pearson</u>		SIGNATURE <u>John H. Pearson</u>		DATE <u>5/19/89</u>	
DEPARTED <u>9:30</u> A.M.		ARRIVE WASTE CONVERSION <u>None</u>		TOTAL DELAY TIME <u>None</u>	
ARRIVAL AT CUSTOMER <u>11:15</u>		REASON FOR DELAY <u></u>			
STARTED LOADING <u>11:25</u>					
END LOADING <u>12:00</u>					
DEPARTED CUSTOMER <u>12:05</u>					
		TRACTOR NO. <u>40</u>		TRAILER NO. <u>1550</u>	

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

AR100259

FORM #102 A

INC

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR
Pink - BILLING FILE

FORM #102 A

AR100260

Waste Conversion

INC.

ORIGINAL
(Red)

2869 Sandstone Drive / Hatfield, Penna. 19440

Number <u>P32132</u> Date <u>5-23-89</u>		STRAIGHT BILL OF LADING NON NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300694		
Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.						
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.						
DATE OF PICKUP <u>5-23-89</u>		EPA IDENTIFICATION CODE NO. <u>Non Regulated Material</u>				
GENERATOR <u>Metro Container Site USEPA Region III</u>		ADDRESS <u>2869 SANDSTONE DRIVE</u>				
CITY <u>Trainer</u>		STATE <u>PA</u>		ZIP <u>19013</u> PHONE <u>302 834 1000</u>		
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY <u>WASTE CONVERSION INC.</u>		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>				
ADDRESS <u>HATFIELD</u>		CITY <u>PA</u>		ZIP <u>19440</u> PHONE <u>215-822-8996</u>		
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL						
PRINT NAME _____		SIGNATURE _____		DATE _____		
TOTAL No. and Types Cont.	E.P.A. Description or D.O.T. Shipping Name			Hazard Class	Weight Volume	
1 T/T	Waste Oil contaminated water			Non DOT Regulated Material	4779	
LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.	QTY	LAB CODE CLIN NO.		
LB13457					Contact: Jack Wilson	
SPECIAL HANDLING INSTRUCTIONS/COMMENTS (Contract No. _____) A NON HAZARDOUS WASTE PER 40 CFR PART 261				PLACARDS PROVIDED/AFFIXED 1. Drive Safely 2. _____		
EMERGENCY INFORMATION!!! Call Generator, (print) <u>Metro Container Site USEPA Region III</u>				CALL: CHEMTREX 800-424-9300 Phone No. A/C <u>302 834 1000</u>		
GENERATOR CERTIFICATION: I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted.						
Print Name <u>Philip Tesse</u>		Signature <u>Philip Tesse</u>		Date Shipped <u>5-23-89</u>		
TRANSPORTER COMPANY <u>WASTE CONVERSION INC.</u>		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>				
ADDRESS <u>2869 SANDSTONE DRIVE</u>		CITY <u>HATFIELD</u>		STATE <u>PA</u> ZIP <u>19440</u> PHONE <u>215-822-8996</u>		
This is to certify acceptance of the above described waste for transportation.						
PRINT NAME <u>Philip Tesse</u>		SIGNATURE <u>Philip Tesse</u>		DATE <u>5-23-89</u>		
DEPARTED _____	6:30	A.M.	P.M.	ARRIVE WASTE CONVERSION _____	A.M.	P.M.
ARRIVAL AT CUSTOMER _____	8:15			TOTAL DELAY TIME <u>No delay</u>		
STARTED LOADING _____	8:20			REASON FOR DELAY <u>NONE</u>		
NO LOADING _____	8:45			TRACTOR NO. <u>28</u>	TRAILER NO. <u>1080</u>	
DEPARTED CUSTOMER _____	9:00					

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITYYellow - RETURN TO GENERATOR
Pink - BILLING FILE

FORM #102 A

AR100261

Waste Conversion

INC.

2869 Sandstone Drive / Hatfield, Penna. 19440

(pay)
ORIGINAL
(Red)Number P34377 Date 5-23-89
Received, subject to the classifications and tariffs in effect on the date of issue of this original Bill of Lading.STRAIGHT
BILL OF LADING
NON NEGOTIABLECOMMONWEALTH OF PENNSYLVANIA
DEPT. OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT
PROCESSING FACILITY
PERMIT NO. 300694

The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.

DATE OF PICKUP 5-23-89 EPA IDENTIFICATION CODE NO. Non Regulated Material
GENERATOR Metro Container Site USEPA Region III ADDRESS _____
CITY Trainer STATE PA ZIP 19013 PHONE 302 834 1000CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY EPA IDENTIFICATION CODE NO. PAD085690592
CONSIGNED TO WASTE CONVERSION INC. ADDRESS 2869 SANDSTONE DRIVE
CITY HATFIELD STATE PA ZIP 19440 PHONE 215-822-8996

THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL

PRINT NAME	SIGNATURE	DATE
TOTAL No. and Types Cont.	E.P.A. Description or D.O.T. Shipping Name	Hazard Class
1 T/T	Waste oil contaminated water	Non DOT Regulated Material
		Weight Volume
		5,500 gal

QTY	LAB CODE CLIN NO	QTY	LAB CODE CLIN NO	QTY	LAB CODE CLIN NO
	LB13457				

Contact: Jack Wilson

SPECIAL HANDLING INSTRUCTIONS/COMMENTS A NON HAZARDOUS WASTE
(Contract No. _____) PER 40 CFR PART 261

PLACARDS PROVIDED/AFFIXED

1. Drive Safely

DRIVERS SIGNATURE

2. _____

X Bobby Pawlowski

EMERGENCY INFORMATION!!!

Call Generator, (print) Metro Container Site USEPA Region III

CALL: CHEMTREX 800-424-9300

Phone No. A/C 302 83 4 1000

GENERATOR CERTIFICATION:

I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition to be transported in commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation, and that all times and delays are correct as noted.

Print Name Kevin Koch Signature [Signature] Date Shipped 5-23-89TRANSPORTER
COMPANY WASTE CONVERSION INC. ADDRESS 2869 SANDSTONE DRIVE
CITY HATFIELD STATE PA ZIP 19440 PHONE 215-822-8996

This is to certify acceptance of the above described waste for transportation.

PRINT NAME Bobby Pawlowski SIGNATURE [Signature] DATE 5-23-89

	A.M.	P.M.
DEPARTED	9/20	
ARRIVAL AT CUSTOMER	10/15	
STARTED LOADING	11/15	
END LOADING		12/10
DEPARTED CUSTOMER		12/10

	A.M.	P.M.
ARRIVE WASTE CONVERSION		
TOTAL DELAY TIME	1 hr 5 min	
REASON FOR DELAY	loading	
TRACTOR NO.	WC-32	
TRAILER NO.	1530	

White - GENERATOR FILE
Blue - TRANSPORTER FILE
Green - PROCESSING FACILITYYellow - RETURN TO GENERATOR
Pink - BILLING FILE

FORM #102 A

AR100262